TAX AND ACCOUNTING CENTER

USER'S GUIDE

Bloomberg BNA

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Our training options are designed to meet your information needs, match your learning style, and accommodate your schedule. For a description of training options, see the back cover. Bloomberg BNA also provides content support for subscribers.

* If you require customer assistance for Bloomberg BNA products before or after regular hours, your call will be forwarded to the 24/7 extended support offices at Bloomberg Law.

GETTING STARTED

Click the **Getting Started** link on the menu bar to begin using Bloomberg BNA's *Tax and Accounting Center™* for the first time and select any of these options:

First-Time User Setup — hardware and software requirements.
Take A Quick Tour — introductory tour of the *Tax and Accounting Center™* in Adobe® Flash™.
Frequently Asked Questions — about the *Tax and Accounting Center™* content and functionality.

Training and Support — contact information for Bloomberg BNA's **Customer Contact Center** and complimentary training and content support resources.
Email Updates (see below).

SIGN UP FOR EMAIL UPDATES

Click **Sign up for email updates**.

The unique User Name and Password and the subscription's components determine the available email choices.

Customize and manage subscription updates. Click the checkbox to select the email title(s). The selection automatically moves to the **Your Selections** column and lists the options available for a title.

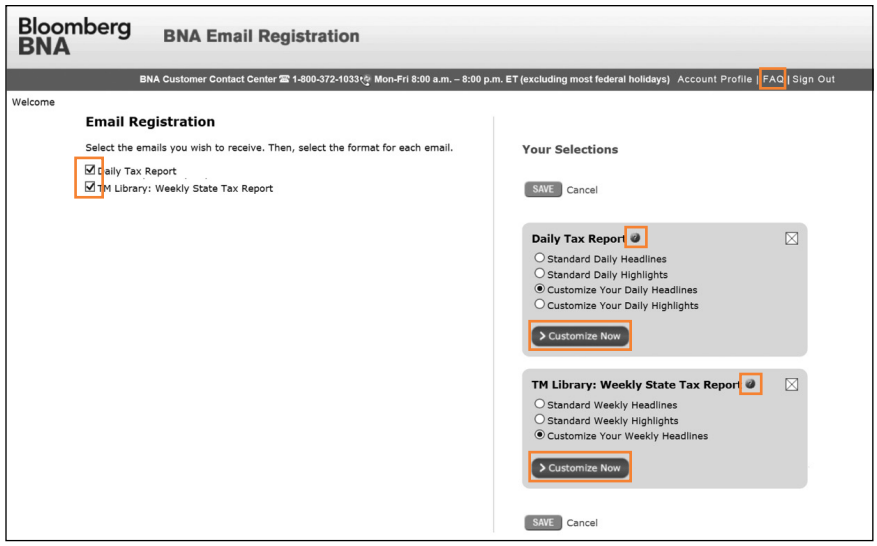
Click the **Info** icon to display descriptive information about the available formats.

When customization is an option, the **Customize Now** button displays. Click it and choose the specific topics, courts, etc., of interest.

Save to retain all changes.

Click the **X**, or deselect a title to delete it.

Click **FAQ** for detailed instructions.



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TAX CENTER APP

Tax Center App - Download this FREE App today!

Stay connected to Bloomberg BNA's *Tax and Accounting Center™* – including *Tax Management Portfolios* – anytime and from anywhere!

The *Tax Center App* content is available to *Bloomberg BNA Tax and Accounting Center™* subscribers only. Use your Bloomberg BNA User Name and Password to get started. The *Tax Center App* offers Tax and Accounting subscribers easy, on-the-go access to federal, state, and international tax analysis, news, integrated source material, and advanced search features, all on the Android™, iPhone® or iPad® devices**.**

Go to www.bna.com/btac-app/ for information on how to download the free *Bloomberg BNA Tax Center App*.

iPad®/iPhone®:

The *Tax Center App* is available on iPhone® and/or iPad® devices. Installation of iTunes® is required to download the app. This app requires iOS 7 or greater. Access the app for your iPhone®/ iPad® on the iTunes store**:**

Android™:

The *Tax Center App* is available on Android™ phones/mobile devices with operating systems of 4.0 and greater. While this app is free, standard data charges from your carrier may apply. Access the app for your Android™ device on Google Play.

iPad® and iPhone® are trademarks of Apple, Inc., registered in the U.S. and other countries.

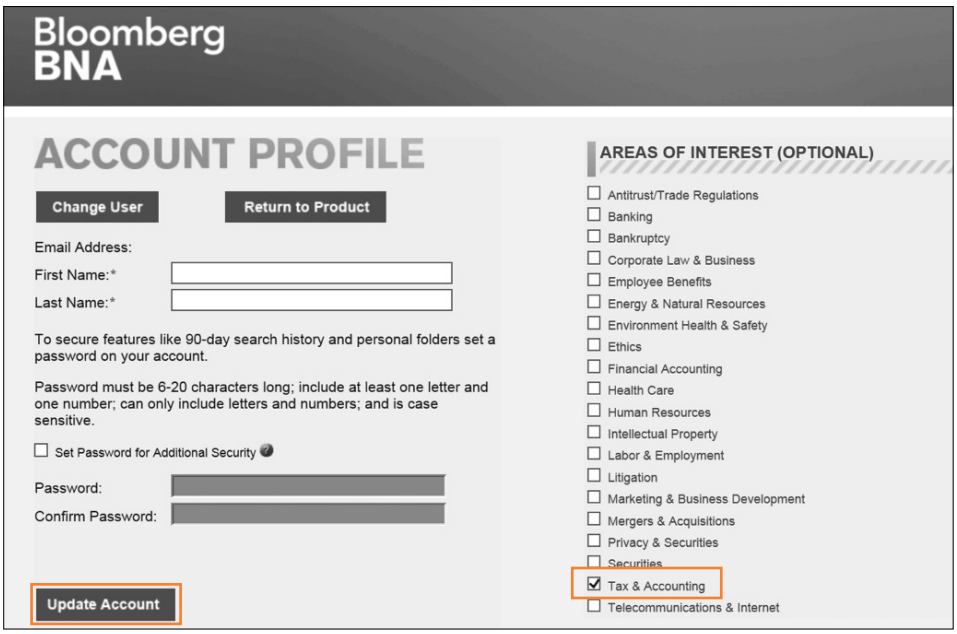
ACCOUNT PROFILE AND PREFERENCES

Activate your **Account Profile** and then use **Preferences** to customize the *Tax and Accounting Center™* to:

- Save documents, charts, and searches to **My Folders** (see page 10).
- Set a default home page.
- Select favorite collections to display on the home page.
- Set default views for **Index** and **Case Search Results**.
- Set a larger text size when viewing the *Resource Center*.

Account Profile

Sign in to your account profile to retain saved preferences, searches, and email customizations.
Under **Areas of Interest**, select **Tax and Accounting**. Click **Update Account**.



Preferences — Daily Tax Report

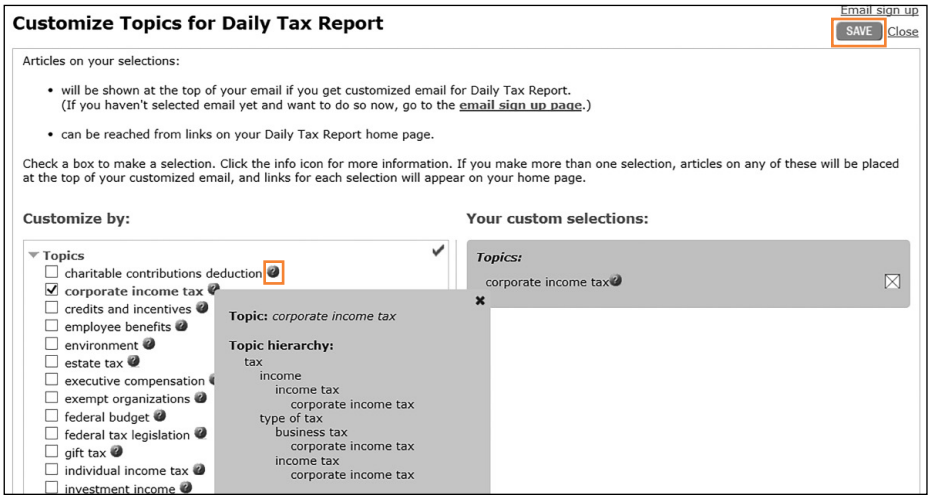
Click **Customize Topics** under the title to select specific content to display on the *Daily Tax Report®* home page.

On the **Customize Topics for Daily Tax Report** screen, make selections for headline display and choose topics, courts, states, and countries of interest to display on the *Daily Tax Report®* home page.

Make the selection(s) and click **SAVE.**

To view the subtopics included in each topic, click the **Info** icon.

To delete a selection, click the **X**.


Customize Topics for Daily Tax Report
Email sign up
SAVE
Close
Articles on your selections:
will be shown at the top of your email if you get customized email for Daily Tax Report.
(If you haven't selected email yet and want to do so now, go to the email sign up page.)
can be reached from links on your Daily Tax Report home page.
Check a box to make a selection. Click the info icon for more information. If you make more than one selection, articles on any of these will be placed at the top of your customized email, and links for each selection will appear on your home page.
Customize by:
Your custom selections:
Topics
charitable contributions deduction
corporate income tax
credits and incentives
employee benefits
environment
estate tax
executive compensation
exempt organizations
federal budget
federal tax legislation
gift tax
individual income tax
investment income
Topics:
corporate income tax
Topic: corporate income tax
Topic hierarchy:
tax
income
income tax
corporate income tax
type of tax
business tax
corporate income tax
income tax
corporate income tax

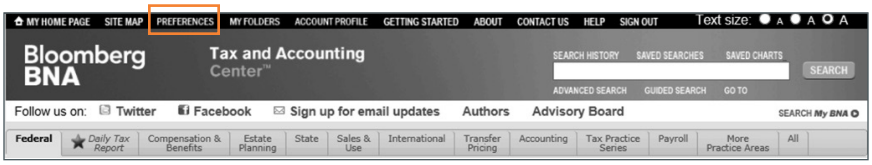
Preferences

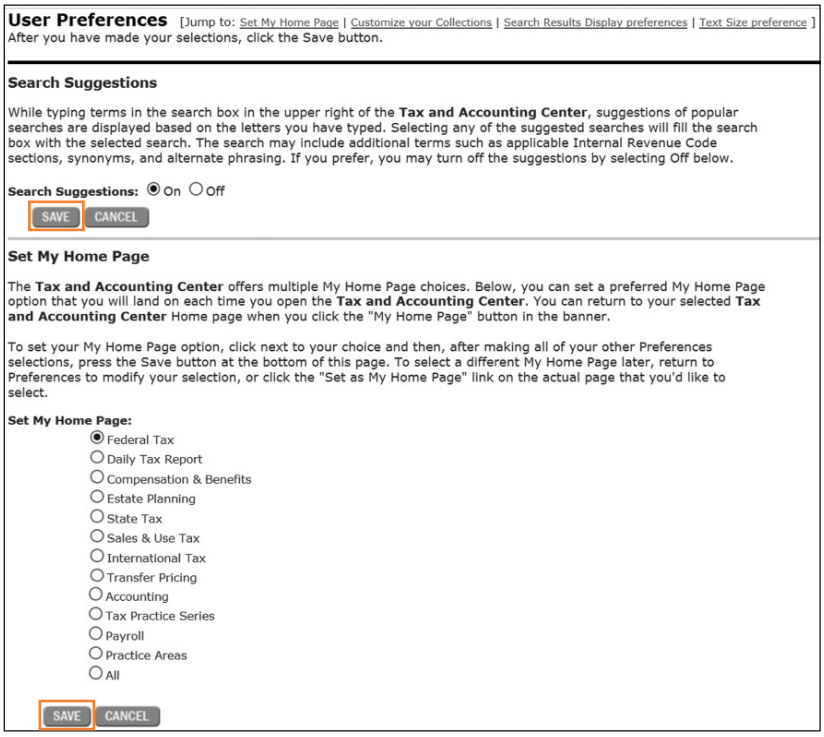
Use **Preferences** to customize the *Tax and Accounting Center™*.

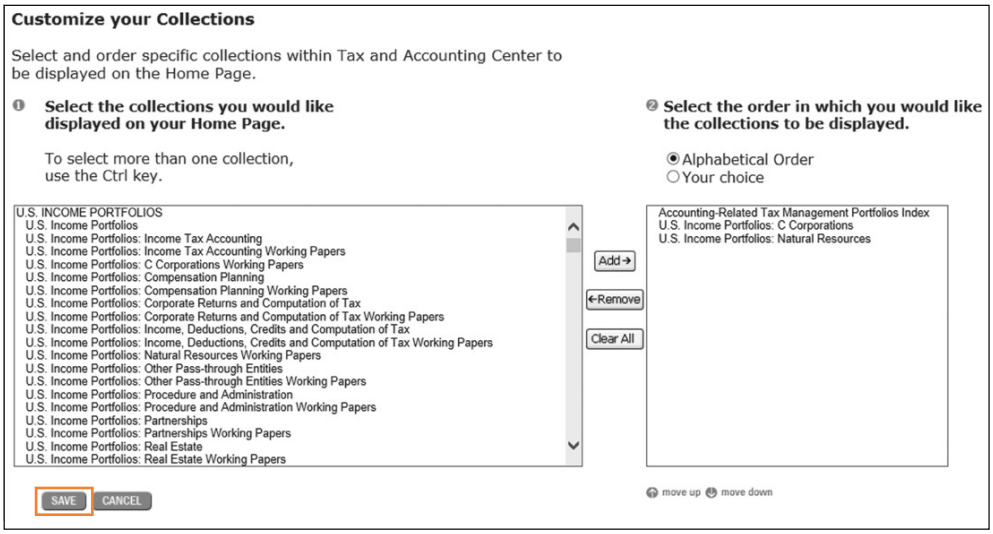
Click **PREFERENCES** on the banner to:

- Decide whether to use **Search Suggestions**.
- Set a specific home page.
- Select favorite collection(s) to display on the home page for one-click access.
- Decide how to view search results display screens.

Click **SAVE** for each frame.




User Preferences
[Jump to: Set My Home Page | Customize your Collections | Search Results Display preferences | Text Size preference]
After you have made your selections, click the Save button.
Search Suggestions
While typing terms in the search box in the upper right of the Tax and Accounting Center, suggestions of popular searches are displayed based on the letters you have typed. Selecting any of the suggested searches will fill the search box with the selected search. The search may include additional terms such as applicable Internal Revenue Code sections, synonyms, and alternate phrasing. If you prefer, you may turn off the suggestions by selecting Off below.
Search Suggestions: On Off
SAVE
CANCEL
Set My Home Page
The Tax and Accounting Center offers multiple My Home Page choices. Below, you can set a preferred My Home Page option that you will land on each time you open the Tax and Accounting Center. You can return to your selected Tax and Accounting Center Home page when you click the "My Home Page" button in the banner.
To set your My Home Page option, click next to your choice and then, after making all of your other Preferences selections, press the Save button at the bottom of this page. To select a different My Home Page later, return to Preferences to modify your selection, or click the "Set as My Home Page" link on the actual page that you'd like to select.
Set My Home Page:
Federal Tax
Daily Tax Report
Compensation & Benefits
Estate Planning
State Tax
Sales & Use Tax
International Tax
Transfer Pricing
Accounting
Tax Practice Series
Payroll
Practice Areas
All
SAVE
CANCEL


Customize your Collections
Select and order specific collections within Tax and Accounting Center to be displayed on the Home Page.
1 Select the collections you would like displayed on your Home Page.
To select more than one collection, use the Ctrl key.
2 Select the order in which you would like the collections to be displayed.
Alphabetical Order
Your choice
U.S. INCOME PORTFOLIOS
U.S. Income Portfolios
U.S. Income Portfolios: Income Tax Accounting
U.S. Income Portfolios: Income Tax Accounting Working Papers
U.S. Income Portfolios: C Corporations Working Papers
U.S. Income Portfolios: Compensation Planning
U.S. Income Portfolios: Compensation Planning Working Papers
U.S. Income Portfolios: Corporate Returns and Computation of Tax
U.S. Income Portfolios: Corporate Returns and Computation of Tax Working Papers
U.S. Income Portfolios: Income, Deductions, Credits and Computation of Tax
U.S. Income Portfolios: Income, Deductions, Credits and Computation of Tax Working Papers
U.S. Income Portfolios: Natural Resources Working Papers
U.S. Income Portfolios: Other Pass-through Entities
U.S. Income Portfolios: Other Pass-through Entities Working Papers
U.S. Income Portfolios: Procedure and Administration
U.S. Income Portfolios: Procedure and Administration Working Papers
U.S. Income Portfolios: Partnerships
U.S. Income Portfolios: Partnerships Working Papers
U.S. Income Portfolios: Real Estate
U.S. Income Portfolios: Real Estate Working Papers
Add→
←Remove
Clear All
Accounting-Related Tax Management Portfolios Index
U.S. Income Portfolios: C Corporations
U.S. Income Portfolios: Natural Resources
move up
move down
SAVE
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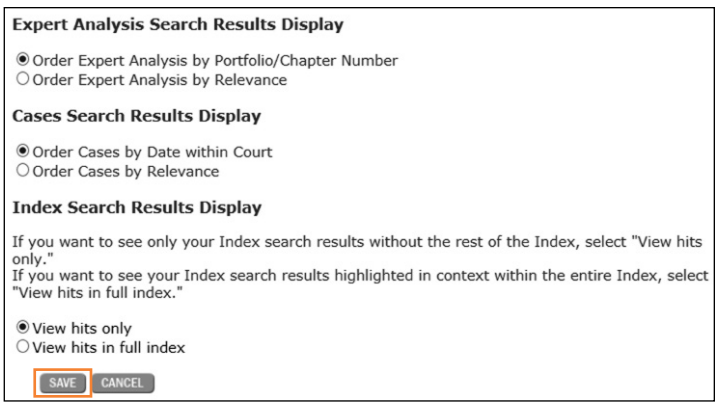

Expert Analysis Search Results Display
Order Expert Analysis by Portfolio/Chapter Number
Order Expert Analysis by Relevance
Cases Search Results Display
Order Cases by Date within Court
Order Cases by Relevance
Index Search Results Display
If you want to see only your Index search results without the rest of the Index, select "View hits only."
If you want to see your Index search results highlighted in context within the entire Index, select "View hits in full index."
View hits only
View hits in full index
SAVE
CANCEL

The *Tax and Accounting Center™* provides intuitive and comprehensive access to Bloomberg BNA's full collection of tax and accounting statutes, regulations, analysis, case law, domestic and international news, and practice tools. The platform covers all areas of tax and accounting law, additionally filtered into topic areas such as Federal, Compensation & Benefits, Estate Planning, State, Sales & Use, International, Transfer Pricing, Accounting, Tax Practice, Payroll, and these additional practice areas: Accounting for Income Taxes, Green Incentives, Real Estate, and Tax-Exempt Organizations.

Bloomberg BNA's content is created by the legal publishing industry's largest and most experienced editorial staff. Our legal editors are subject-matter experts — not generalists. The legal editors of Bloomberg BNA's *Tax and Accounting Center™* review all tax and accounting cases, then draw upon decades of experience to carefully identify the significant points that every tax and accounting practitioner needs to see. The editors also analyze and pull together the relevant laws and regulations.

The *Tax and Accounting Center™* makes research fast, easy, and accurate with expertly prepared indexes. It offers an intuitive search interface with advanced search capabilities, and simple, easy-to-use navigation.

Some of the content included in the *Tax and Accounting Center™*:

- *BNA Insights* articles featuring expert analysis from leading practitioners on key developments and trends in tax and accounting practice
- *Fast Answers™*
- Federal and State *Tax Navigators*
- International Payroll Guides
- News & Commentary
- Federal and State Practice Tools, including chart builders
- Source Documents
- Tax Advisors
- Tax & Accounting Portfolios
- Tax Forms and Tax Prep Guides
- *Tax Practice Series™*
- And much more.

HOME PAGES

Use the tabs to link to all content included in your subscription.

Each tab has a home page with topic-specific collections of content and tools.

MENU BAR

The menu bar is located above the banner and contains links for **Site Map**, **Preferences**, **My Folders**, **Account Profile**, **Getting Started**, **About**, **Contact Us**, **Help**, **Sign Out**, and **Text size**.

BANNER

The banner displays on all pages in the *Tax and Accounting Center*™. In addition to the menu bar, find the **Quick Search** text box, **Search History**, **Saved Searches**, **Saved Charts**, **Advanced Search**, **Guided Search**, **Go To**, networking links, links to Bloomberg BNA **Authors**, the **Advisory Board**, and **Search My BNA**.

Quick Search – Search in all collections included in your subscription. When you are working in a collection, the banner displays the added option to search in **All** or the **This Collection** or **This Portfolio**.

Search History/Saved Searches/Saved Charts – Searches are retained in the **Search History** queue for 90 days. **Save** them to retain a search past 90 days. To access a saved search or saved chart, click **Saved Searches** or **Saved Charts**.

Advanced Search – Use the **Advanced Search** template to design a search within a specific collection. Options for field searching and date limiters are also available on the template.

Guided Search – Offers a variety of search forms designed to search within specific collections. Specially targeted fields and search features are available for each type of collection

Go To – Use **Go To** to locate a document, case, or Expert Analysis with a full or partial citation.

Networking Links – Follow Bloomberg BNA on Twitter and/or Facebook.

Sign up for Email Updates – See page 2 for detailed information on selecting **Email Updates**.

Authors – List of 1,000 of the world's leading tax and financial accounting experts contributing to the *Tax and Accounting Center*™.

Advisory Board – Discuss taxation issues with our expert authors firsthand in an ongoing series of practitioner-to-practitioner monthly Advisory Board Meetings located in New York City.

Search My BNA – Conduct a cross-product search in all of your subscriptions by clicking **Search My BNA**. Note: this feature only appears if you subscribe to more than one Bloomberg BNA service.

HOME PAGE — FEDERAL

Each tab has topic specific content and tools.
Set As My Home Page – Click **Set As My Home Page** to set the page so it opens at sign on.
More Practice Areas – Additional content collections are available for: **Accounting for Income Taxes**, **Green Incentives**, **Real Estate**, and **Tax-Exempt Organizations**.

Go To Document by Citation
Click **More** and find Portfolios, cases, statutes, and regulations by citation

Expert Analysis
Portfolios, Navigators, and Tax Advisors with links to the available indexes

Tax Forms & Guides
Interactive Tax Forms, Federal Tax Guide, and Tax Prep Guides

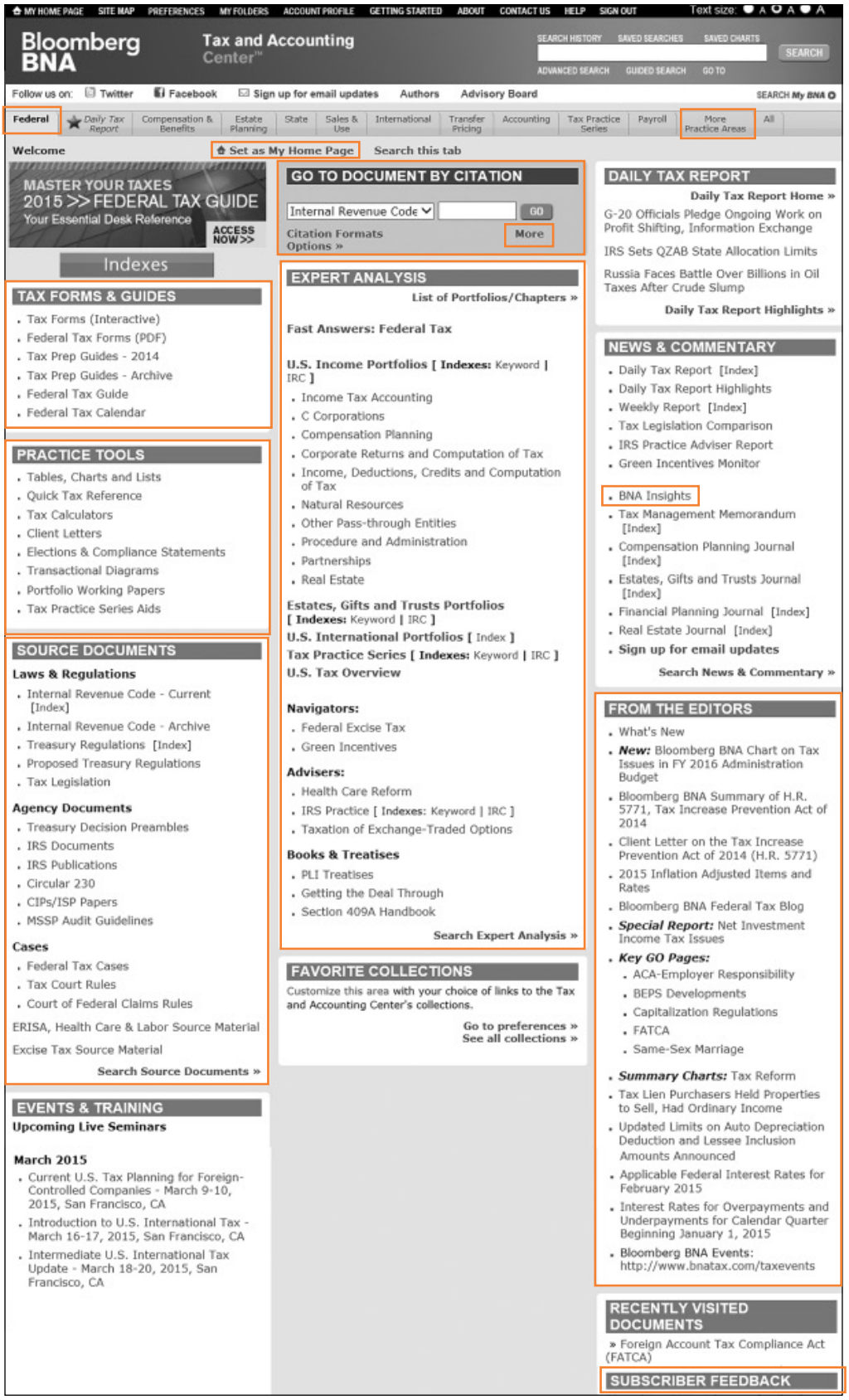
Practice Tools
Tax Chart Builders, Tax Calculators, Development and Explanatory Letters, and more

Source Documents
Laws & regulations, agency documents, and cases

BNA Insights
In the **News & Commentary** frame find practitioner-authored insights into trending issues in tax and accounting law

From the Editors
Microsites, Special Reports, Research Pages, and more created by the editors to address current issues and trends in tax and accounting law

Subscriber Feedback
Please share your experience with the *Tax and Accounting Center™*


Bloomberg BNA
Tax and Accounting Center™
Federal
Welcome
Set as My Home Page
Search this tab
MASTER YOUR TAXES 2015 >> FEDERAL TAX GUIDE
Your Essential Desk Reference
ACCESS NOW >>
Indexes
TAX FORMS & GUIDES
Tax Forms (Interactive)
Federal Tax Forms (PDF)
Tax Prep Guides - 2014
Tax Prep Guides - Archive
Federal Tax Guide
Federal Tax Calendar
PRACTICE TOOLS
Tables, Charts and Lists
Quick Tax Reference
Tax Calculators
Client Letters
Elections & Compliance Statements
Transactional Diagrams
Portfolio Working Papers
Tax Practice Series Aids
SOURCE DOCUMENTS
Laws & Regulations
Internal Revenue Code - Current [Index]
Internal Revenue Code - Archive
Treasury Regulations [Index]
Proposed Treasury Regulations
Tax Legislation
Agency Documents
Treasury Decision Preambles
IRS Documents
IRS Publications
Circular 230
CIPs/ISP Papers
MSSP Audit Guidelines
Cases
Federal Tax Cases
Tax Court Rules
Court of Federal Claims Rules
ERISA, Health Care & Labor Source Material
Excise Tax Source Material
Search Source Documents »
EVENTS & TRAINING
Upcoming Live Seminars
March 2015
Current U.S. Tax Planning for Foreign-Controlled Companies - March 9-10, 2015, San Francisco, CA
Introduction to U.S. International Tax - March 16-17, 2015, San Francisco, CA
Intermediate U.S. International Tax Update - March 18-20, 2015, San Francisco, CA
GO TO DOCUMENT BY CITATION
Internal Revenue Code
GO
Citation Formats Options »
More
EXPERT ANALYSIS
List of Portfolios/Chapters »
Fast Answers: Federal Tax
U.S. Income Portfolios [Indexes: Keyword | IRC]
Income Tax Accounting
C Corporations
Compensation Planning
Corporate Returns and Computation of Tax
Income, Deductions, Credits and Computation of Tax
Natural Resources
Other Pass-through Entities
Procedure and Administration
Partnerships
Real Estate
Estates, Gifts and Trusts Portfolios [Indexes: Keyword | IRC]
U.S. International Portfolios [Index]
Tax Practice Series [Indexes: Keyword | IRC]
U.S. Tax Overview
Navigators:
Federal Excise Tax
Green Incentives
Advisers:
Health Care Reform
IRS Practice [Indexes: Keyword | IRC]
Taxation of Exchange-Traded Options
Books & Treatises
PLI Treatises
Getting the Deal Through
Section 409A Handbook
Search Expert Analysis »
FAVORITE COLLECTIONS
Customize this area with your choice of links to the Tax and Accounting Center's collections.
Go to preferences »
See all collections »
DAILY TAX REPORT
Daily Tax Report Home »
G-20 Officials Pledge Ongoing Work on Profit Shifting, Information Exchange
IRS Sets QZAB State Allocation Limits
Russia Faces Battle Over Billions in Oil Taxes After Crude Slump
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Daily Tax Report Highlights
Weekly Report [Index]
Tax Legislation Comparison
IRS Practice Adviser Report
Green Incentives Monitor
BNA Insights
Tax Management Memorandum [Index]
Compensation Planning Journal [Index]
Estates, Gifts and Trusts Journal [Index]
Financial Planning Journal [Index]
Real Estate Journal [Index]
Sign up for email updates
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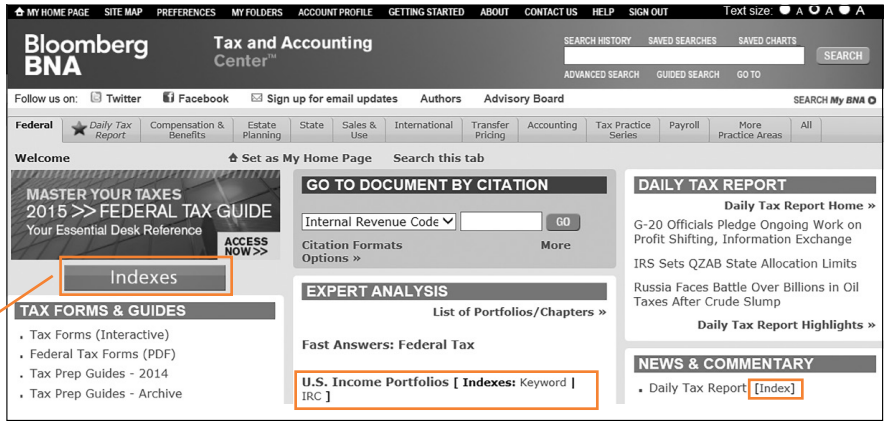
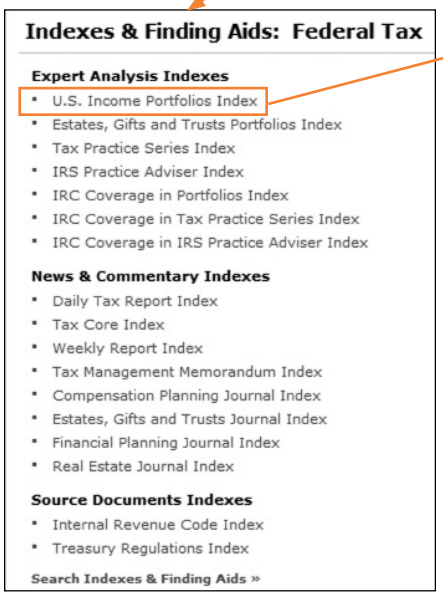
FROM THE EDITORS
What's New
New: Bloomberg BNA Chart on Tax Issues in FY 2016 Administration Budget
Bloomberg BNA Summary of H.R. 5771, Tax Increase Prevention Act of 2014
Client Letter on the Tax Increase Prevention Act of 2014 (H.R. 5771)
2015 Inflation Adjusted Items and Rates
Bloomberg BNA Federal Tax Blog
Special Report: Net Investment Income Tax Issues
Key GO Pages:
ACA-Employer Responsibility
BEPS Developments
Capitalization Regulations
FATCA
Same-Sex Marriage
Summary Charts: Tax Reform
Tax Lien Purchasers Held Properties to Sell, Had Ordinary Income
Updated Limits on Auto Depreciation Deduction and Lessee Inclusion Amounts Announced
Applicable Federal Interest Rates for February 2015
Interest Rates for Overpayments and Underpayments for Calendar Quarter Beginning January 1, 2015
Bloomberg BNA Events: http://www.bnatax.com/taxevents
RECENTLY VISITED DOCUMENTS
» Foreign Account Tax Compliance Act (FATCA)
SUBSCRIBER FEEDBACK

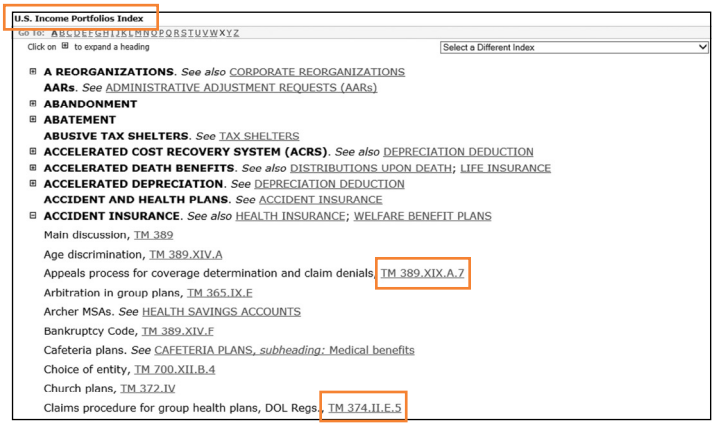
INDEXES

Bloomberg BNA Indexes are compiled by legal-subject specialists. Click the **Indexes** button to display the linked list of indexes. Some content collections have an index link next to the name link.

1. The topic-specific **Indexes & Finding Aids** window displays.
2. To browse, click an index link and menu-walk through the content. Click the citation links to view full text.
3. To search, use the **Advanced Search** template, and select any or all of the specific indexes for the search.
4. Some indexes are also accessed by a link next to the content.




Indexes & Finding Aids: Federal Tax
Expert Analysis Indexes
U.S. Income Portfolios Index
Estates, Gifts and Trusts Portfolios Index
Tax Practice Series Index
IRS Practice Adviser Index
IRC Coverage in Portfolios Index
IRC Coverage in Tax Practice Series Index
IRC Coverage in IRS Practice Adviser Index
News & Commentary Indexes
Daily Tax Report Index
Tax Core Index
Weekly Report Index
Tax Management Memorandum Index
Compensation Planning Journal Index
Estates, Gifts and Trusts Journal Index
Financial Planning Journal Index
Real Estate Journal Index
Source Documents Indexes
Internal Revenue Code Index
Treasury Regulations Index
Search Indexes & Finding Aids »


U.S. Income Portfolios Index
A REORGANIZATIONS. See also CORPORATE REORGANIZATIONS
AARs. See ADMINISTRATIVE ADJUSTMENT REQUESTS (AARs)
ABANDONMENT
ABATEMENT
ABUSIVE TAX SHELTERS. See TAX SHELTERS
ACCELERATED COST RECOVERY SYSTEM (ACRS). See also DEPRECIATION DEDUCTION
ACCELERATED DEATH BENEFITS. See also DISTRIBUTIONS UPON DEATH; LIFE INSURANCE
ACCELERATED DEPRECIATION. See DEPRECIATION DEDUCTION
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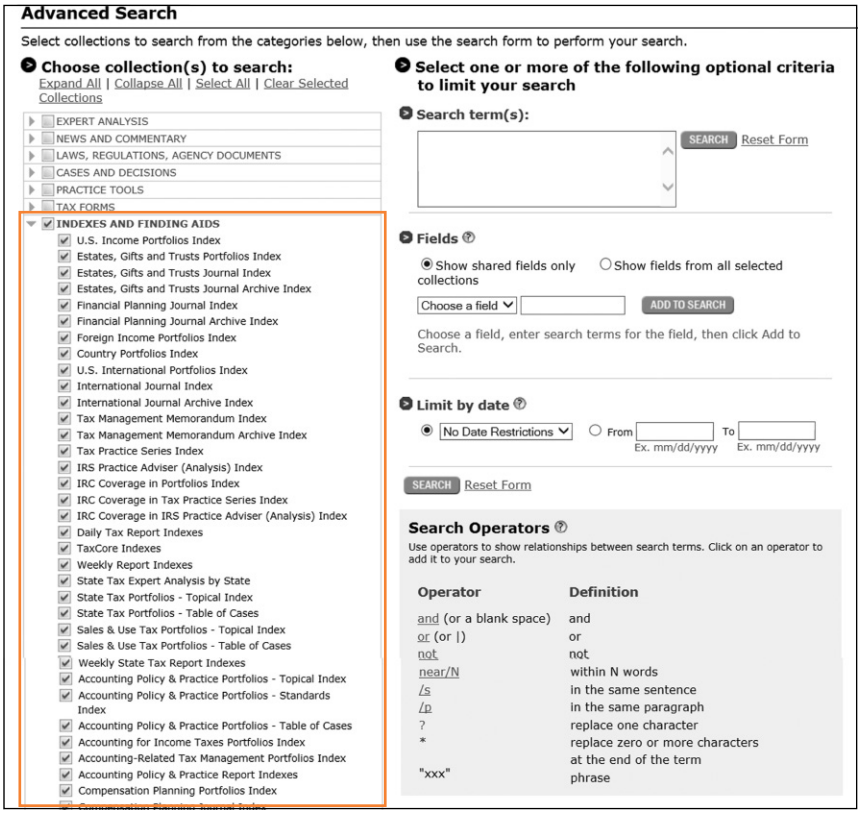
Church plans, TM 372.IV
Claims procedure for group health plans, DOL Regs., TM 374.II.E.5


Advanced Search
Select collections to search from the categories below, then use the search form to perform your search.
Choose collection(s) to search:
Select one or more of the following optional criteria to limit your search
Search term(s):
Fields
Limit by date
Search Operators
INDEXES AND FINDING AIDS
U.S. Income Portfolios Index
Estates, Gifts and Trusts Portfolios Index
Estates, Gifts and Trusts Journal Index
Financial Planning Journal Index
Foreign Income Portfolios Index
Country Portfolios Index
U.S. International Portfolios Index
International Journal Index
Tax Management Memorandum Index
Tax Practice Series Index
IRS Practice Adviser (Analysis) Index
IRC Coverage in Portfolios Index
IRC Coverage in Tax Practice Series Index
IRC Coverage in IRS Practice Adviser (Analysis) Index
Daily Tax Report Indexes
TaxCore Indexes
Weekly Report Indexes
State Tax Expert Analysis by State
State Tax Portfolios - Topical Index
State Tax Portfolios - Table of Cases
Sales & Use Tax Portfolios - Topical Index
Sales & Use Tax Portfolios - Table of Cases
Weekly State Tax Report Indexes
Accounting Policy & Practice Portfolios - Topical Index
Accounting Policy & Practice Portfolios - Standards Index
Accounting Policy & Practice Portfolios - Table of Cases
Accounting for Income Taxes Portfolios Index
Accounting-Related Tax Management Portfolios Index
Accounting Policy & Practice Report Indexes
Compensation Planning Portfolios Index

MY FOLDERS

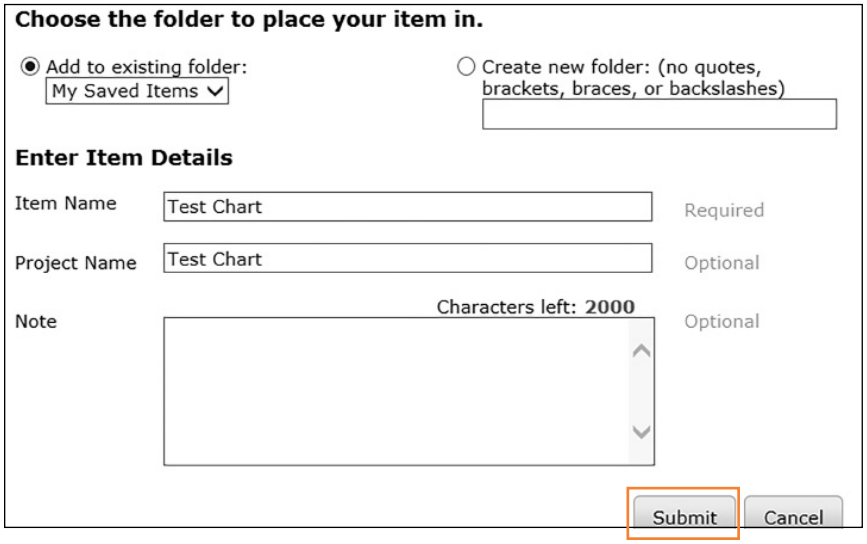
Use the **My Folders** feature to retain a search string or document. Log into your **ACCOUNT PROFILE** in order to use this feature (see page 4).

To save a search string, click **Add to My Folders** on the **Search Options** toolbar.

To save a document or chart, click **Add to My Folders** while viewing the file.

Go: Browse Contents | Portfolio Outline Search Options: Edit | Search Within Results | Add to My Folders Clear | Go to Hit
Results in: U.S. Income (232) | Treatises (133) | Estates, Gifts and Trusts (66)
Add to My Folders
Share
Split Screen

Add the document or search to an existing folder, or create a new folder. Add additional identifying information as needed and click **Submit**.

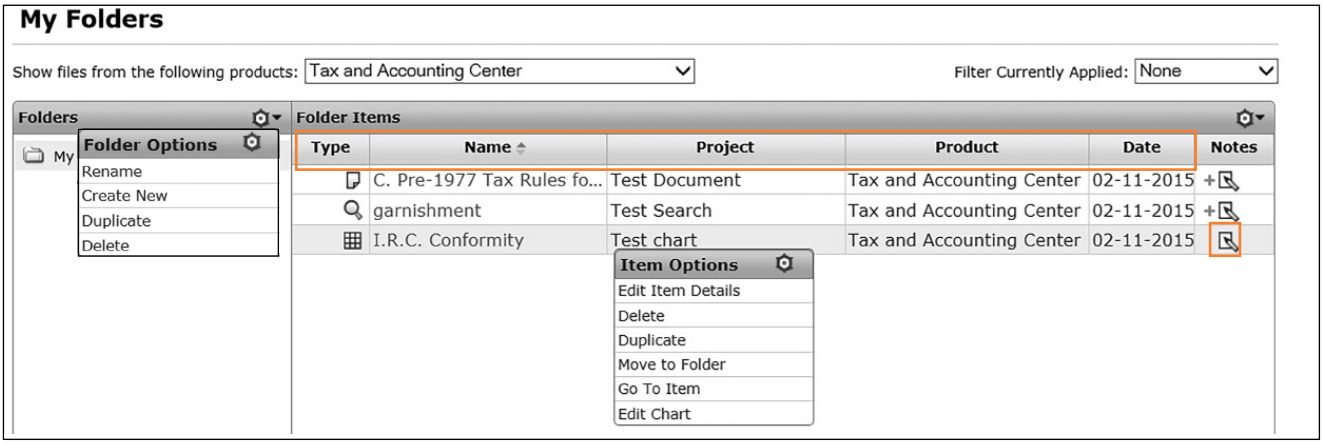


To access the saved file, click **MY FOLDERS** on the menu bar.

To sort by column, click a column heading (**Type**, **Name**, etc.). To display the **Folder Options** drop-down menu, click the **Wheel** icon on the **Folders** column.

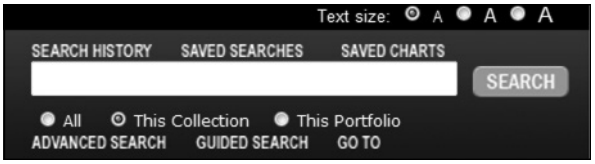
Right-click on the item name to display the **Item Options** drop-down menu.

To create a note, click the **Notes** icon in the **Notes** column, enter text, and click **Submit**.
A **Notes** icon without the plus sign signals a note has been added. Click the icon to view the note.



SEARCH

Access search templates from the search box on the banner.



Quick Search

Search all content included in your subscription. When working in a collection or Portfolio, the banner displays the added option to search in All | This Collection | This Portfolio. Select an option and enter search terms in the text box. Click **SEARCH**.

Advanced Search

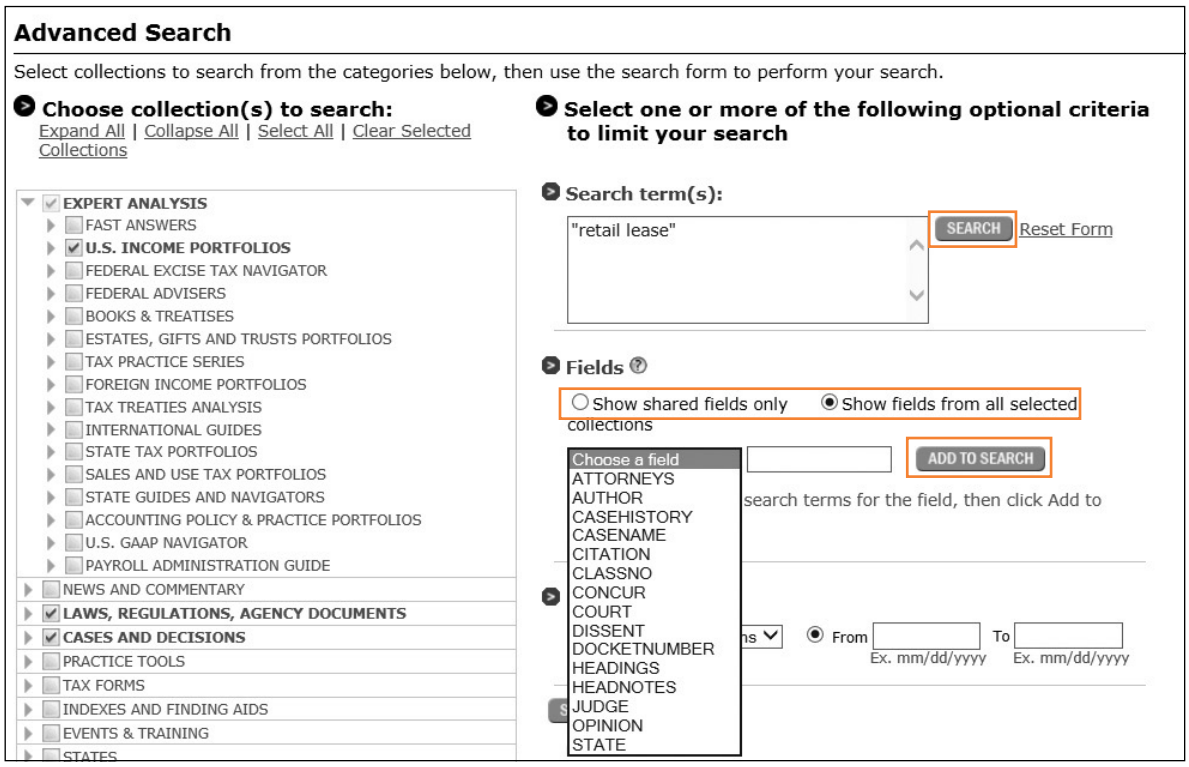
The **Advanced Search** template is most flexible when structuring a search. Choose specific collection(s) to search in with options to use fields, search operators, and/or date restrictions.

Search Fields

Add search fields to limit the range of a search and increase the relevance of the search results. The searchable fields are specific to the collection(s) being searched, and multiple fields can be searched simultaneously.

After the collection(s) are selected, use as many fields as needed to complete the search string.

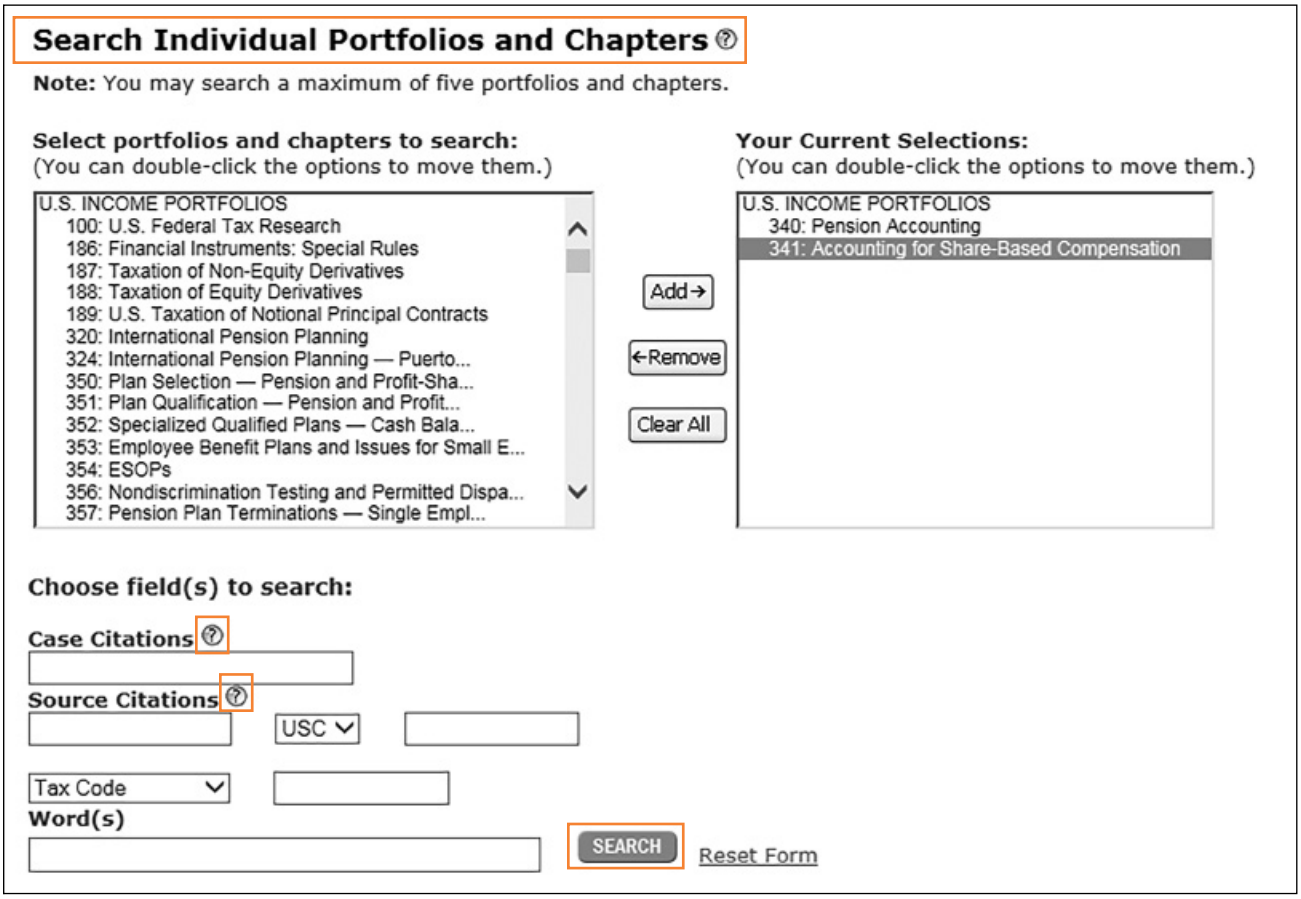
1. In the **Fields** frame, choose to **Show shared fields**, or **Show fields from all selected collections**.
2. Select a field from the **Choose a field** drop-down menu.
3. Enter your search terms in the text box next to **Choose a field**.
4. [Enter] or click **ADD TO SEARCH**. The search term(s) are added to the search string in the **Search Term(s)** text box.



Guided Search

Use preselected fields organized by content type for searching in specific collection(s). On the **Guided Searches** page, use **Expert Analysis** tab templates to search in an individual Portfolio.

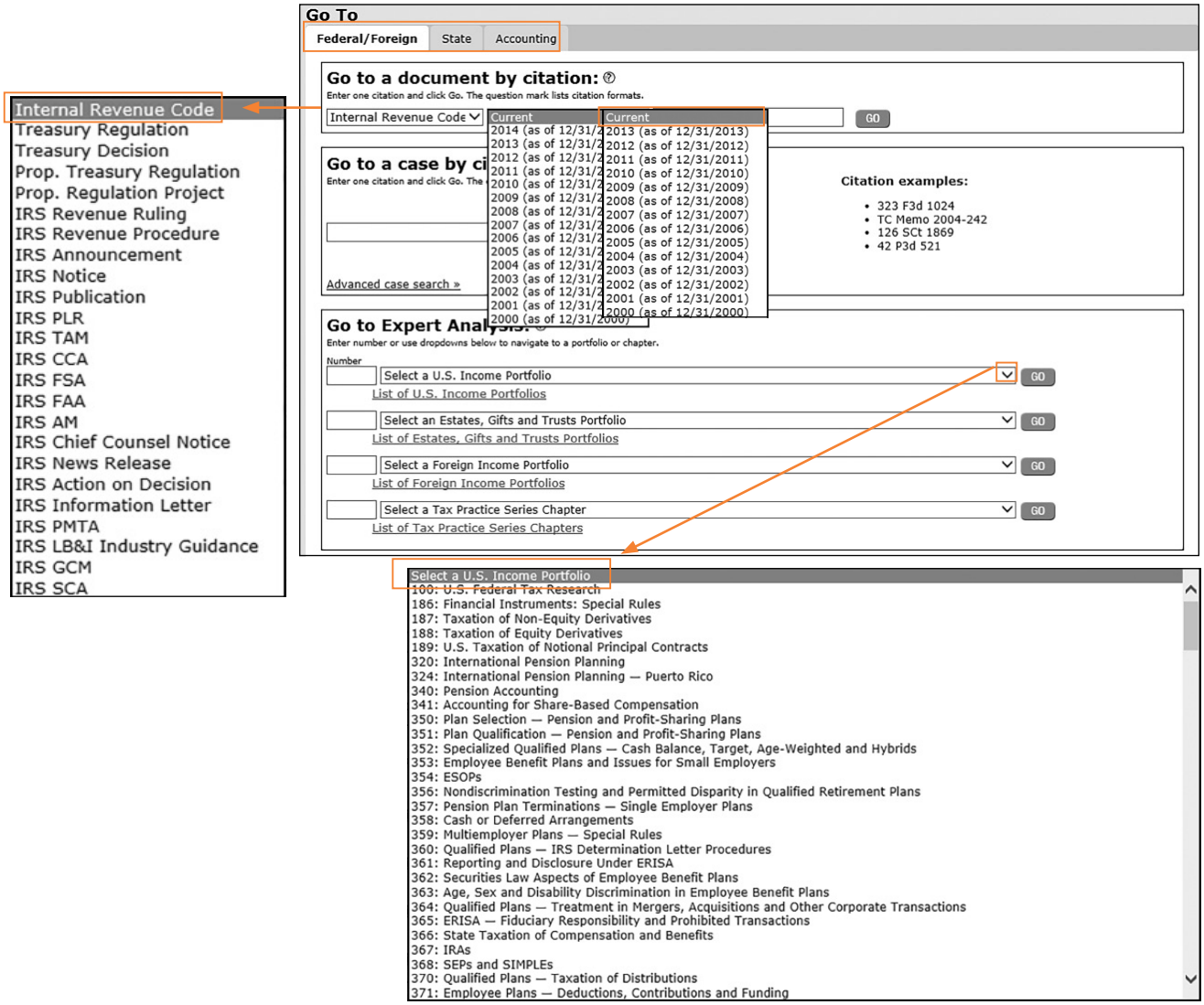
Scroll down the **Expert Analysis** tab to find the **Search Individual Portfolios and Chapters** template. Select the Portfolio(s), click **Add**, and utilize any of the optional fields: **Case Citations**, **Source Citations**, or **Word(s)**. Click the **Info** icon to view specific information about entering data into a field. Click **SEARCH**.


Search Individual Portfolios and Chapters
Note: You may search a maximum of five portfolios and chapters.
Select portfolios and chapters to search:
(You can double-click the options to move them.)
U.S. INCOME PORTFOLIOS
100: U.S. Federal Tax Research
186: Financial Instruments: Special Rules
187: Taxation of Non-Equity Derivatives
188: Taxation of Equity Derivatives
189: U.S. Taxation of Notional Principal Contracts
320: International Pension Planning
324: International Pension Planning — Puerto...
350: Plan Selection — Pension and Profit-Sha...
351: Plan Qualification — Pension and Profit...
352: Specialized Qualified Plans — Cash Bala...
353: Employee Benefit Plans and Issues for Small E...
354: ESOPs
356: Nondiscrimination Testing and Permitted Dispa...
357: Pension Plan Terminations — Single Empl...
Add→
←Remove
Clear All
Your Current Selections:
(You can double-click the options to move them.)
U.S. INCOME PORTFOLIOS
340: Pension Accounting
341: Accounting for Share-Based Compensation
Choose field(s) to search:
Case Citations
Source Citations
USC
Tax Code
Word(s)
SEARCH
Reset Form

Go To

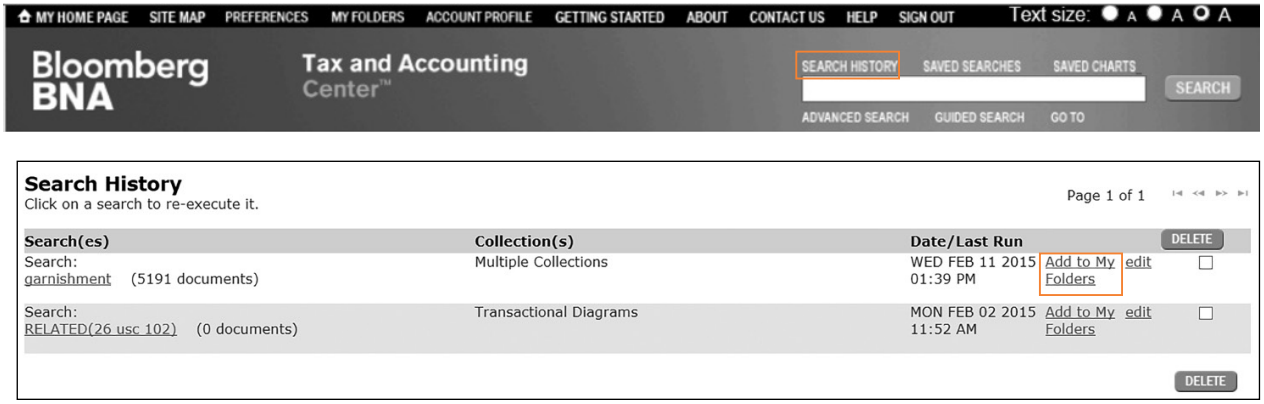
Use **Go To** to locate a source document, tax case, or specific Portfolio by citation, number, or name. Templates are arranged by **Federal/Foreign**, **State**, and **Accounting**.

Click the **Info** icon for detailed information about how to use the specific frames.
Note: To search the current and archived Code back to 2000 use the **Go to a document by citation** drop-down menus.


Internal Revenue Code
Treasury Regulation
Treasury Decision
Prop. Treasury Regulation
Prop. Regulation Project
IRS Revenue Ruling
IRS Revenue Procedure
IRS Announcement
IRS Notice
IRS Publication
IRS PLR
IRS TAM
IRS CCA
IRS FSA
IRS FAA
IRS AM
IRS Chief Counsel Notice
IRS News Release
IRS Action on Decision
IRS Information Letter
IRS PMTA
IRS LB&I Industry Guidance
IRS GCM
IRS SCA
Go To
Federal/Foreign
State
Accounting
Go to a document by citation:
Enter one citation and click Go. The question mark lists citation formats.
Internal Revenue Code
Current
2014 (as of 12/31/2)
2013 (as of 12/31/2)
2012 (as of 12/31/2)
2011 (as of 12/31/2)
2010 (as of 12/31/2)
2009 (as of 12/31/2)
2008 (as of 12/31/2)
2007 (as of 12/31/2)
2006 (as of 12/31/2)
2005 (as of 12/31/2)
2004 (as of 12/31/2)
2003 (as of 12/31/2)
2002 (as of 12/31/2)
2001 (as of 12/31/2)
2000 (as of 12/31/2000)
Current
2013 (as of 12/31/2013)
2012 (as of 12/31/2012)
2011 (as of 12/31/2011)
2010 (as of 12/31/2010)
2009 (as of 12/31/2009)
2008 (as of 12/31/2008)
2007 (as of 12/31/2007)
2006 (as of 12/31/2006)
2005 (as of 12/31/2005)
2004 (as of 12/31/2004)
2003 (as of 12/31/2003)
2002 (as of 12/31/2002)
2001 (as of 12/31/2001)
2000 (as of 12/31/2000)
GO
Go to a case by ci
Enter one citation and click Go. The
Advanced case search »
Citation examples:
323 F3d 1024
TC Memo 2004-242
126 SCt 1869
42 P3d 521
Go to Expert Analysis:
Enter number or use dropdowns below to navigate to a portfolio or chapter.
Number
Select a U.S. Income Portfolio
List of U.S. Income Portfolios
Select an Estates, Gifts and Trusts Portfolio
List of Estates, Gifts and Trusts Portfolios
Select a Foreign Income Portfolio
List of Foreign Income Portfolios
Select a Tax Practice Series Chapter
List of Tax Practice Series Chapters
Select a U.S. Income Portfolio
100: U.S. Federal Tax Research
186: Financial Instruments: Special Rules
187: Taxation of Non-Equity Derivatives
188: Taxation of Equity Derivatives
189: U.S. Taxation of Notional Principal Contracts
320: International Pension Planning
324: International Pension Planning — Puerto Rico
340: Pension Accounting
341: Accounting for Share-Based Compensation
350: Plan Selection — Pension and Profit-Sharing Plans
351: Plan Qualification — Pension and Profit-Sharing Plans
352: Specialized Qualified Plans — Cash Balance, Target, Age-Weighted and Hybrids
353: Employee Benefit Plans and Issues for Small Employers
354: ESOPs
356: Nondiscrimination Testing and Permitted Disparity in Qualified Retirement Plans
357: Pension Plan Terminations — Single Employer Plans
358: Cash or Deferred Arrangements
359: Multiemployer Plans — Special Rules
360: Qualified Plans — IRS Determination Letter Procedures
361: Reporting and Disclosure Under ERISA
362: Securities Law Aspects of Employee Benefit Plans
363: Age, Sex and Disability Discrimination in Employee Benefit Plans
364: Qualified Plans — Treatment in Mergers, Acquisitions and Other Corporate Transactions
365: ERISA — Fiduciary Responsibility and Prohibited Transactions
366: State Taxation of Compensation and Benefits
367: IRAs
368: SEPs and SIMPLEs
370: Qualified Plans — Taxation of Distributions
371: Employee Plans — Deductions, Contributions and Funding

Search History

Click **Search History** on the banner to view up to 90 days of search history. To take advantage of this feature, be sure to log in to your **Account Profile**. Each listed search includes a date and time stamp. To retain a search for future use, click **Add to My Folders**.

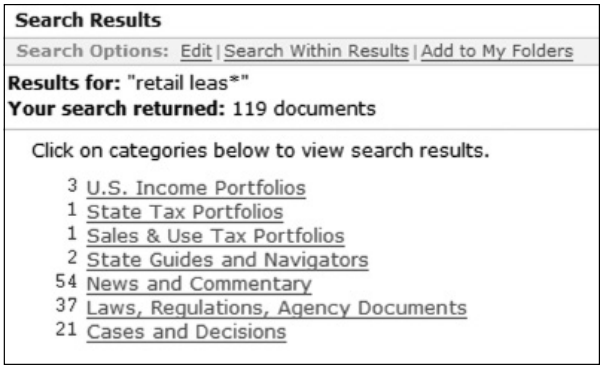


SEARCH RESULTS

Search Results are initially returned by categories: **U.S. Income Portfolios**, **State Tax Portfolios**, etc. Click the relevant category to view the document(s) for each category list.

Search Results for **Cases and Decisions** are organized by court and are sequential by date within each court grouping. There is also an option to display search results by relevance.

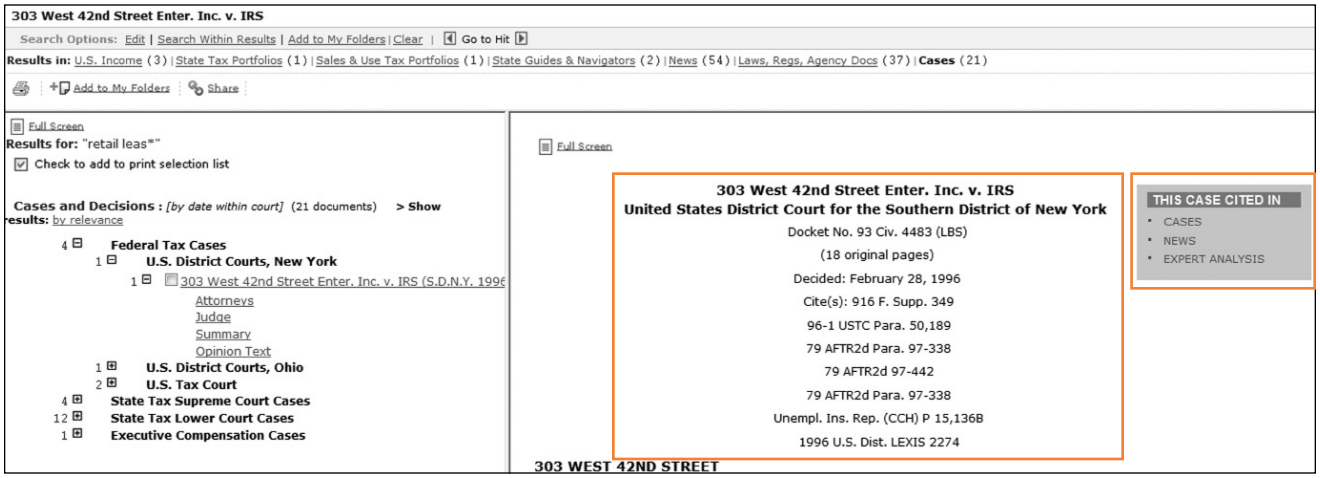
Simultaneously view the **Search Results** list and the full text by using the **Split Screen** option. Click **Full Screen** to toggle back to the full-screen display.


Search Results
Search Options: Edit | Search Within Results | Add to My Folders
Results for: "retail leas*"
Your search returned: 119 documents
Click on categories below to view search results.
3 U.S. Income Portfolios
1 State Tax Portfolios
1 Sales & Use Tax Portfolios
2 State Guides and Navigators
54 News and Commentary
37 Laws, Regulations, Agency Documents
21 Cases and Decisions

303 West 42nd Street Enter. Inc. v. IRS
Search Options: Edit | Search Within Results | Add to My Folders | Clear | Go to Hit
Results in: U.S. Income (3) | State Tax Portfolios (1) | Sales & Use Tax Portfolios (1) | News (54) | Laws, Regs, Agency Docs (42) | Cases (22)
Add to My Folders | Share
Full Screen
Results for: "retail leas*"
Check to add to print selection list
Cases and Decisions : [by date within court] (22 documents)
Show results: by relevance
Federal Tax Cases
U.S. District Courts, New York
303 West 42nd Street Enter. Inc. v. IRS (
303 West 42nd Street Enter. Inc. v. IRS
United States District Court for the Southern District of New York
Docket No. 93 Civ. 4483 (LBS)
Decided: February 28, 1996
79 AFTR2d Para. 97-338
THIS CASE CITED IN
CASES
NEWS
EXPERT ANALYSIS

Case Citations – Locate the Bloomberg BNA citation in the heading of the decision. If a non-Bloomberg BNA citation is available, both the Bloomberg BNA and non-Bloomberg BNA citations are listed in the title area.

This Case Cited In – Choose a category to view where the current case is cited.


303 West 42nd Street Enter. Inc. v. IRS
Search Options: Edit | Search Within Results | Add to My Folders | Clear | Go to Hit
Results in: U.S. Income (3) | State Tax Portfolios (1) | Sales & Use Tax Portfolios (1) | State Guides & Navigators (2) | News (54) | Laws, Regs, Agency Docs (37) | Cases (21)
Add to My Folders | Share
Full Screen
Results for: "retail leas*"
Check to add to print selection list
Cases and Decisions : [by date within court] (21 documents) > Show
esults: by relevance
Federal Tax Cases
U.S. District Courts, New York
303 West 42nd Street Enter. Inc. v. IRS (S.D.N.Y. 1996
Attorneys
Judge
Summary
Opinion Text
U.S. District Courts, Ohio
U.S. Tax Court
State Tax Supreme Court Cases
State Tax Lower Court Cases
Executive Compensation Cases
303 West 42nd Street Enter. Inc. v. IRS
United States District Court for the Southern District of New York
Docket No. 93 Civ. 4483 (LBS)
(18 original pages)
Decided: February 28, 1996
Cite(s): 916 F. Supp. 349
96-1 USTC Para. 50,189
79 AFTR2d Para. 97-338
79 AFTR2d 97-442
79 AFTR2d Para. 97-338
Unempl. Ins. Rep. (CCH) P 15,136B
1996 U.S. Dist. LEXIS 2274
THIS CASE CITED IN
CASES
NEWS
EXPERT ANALYSIS
303 WEST 42ND STREET

Search Results Toolbar

The search results toolbar resides on top of the screen on the search results display.

Search Within Results – Use this link to refine a search and limit the results by adding additional search terms or criteria (available only when using the **Advanced Search** option).
Go to Hit – Navigate to and through the search result document(s).
Results in – Toggle among the content categories included in a set of the search results.
Add to My Folders: Search – Click to add a search string to a folder. See page 10 for additional information.
Print – Click the **Print** icon to launch the print function.
Add to My Folders: Document – Click to add a document or chart to a folder. See page 10 for additional information.
Share – Send a document link to other Bloomberg BNA *Tax and Accounting Center*™ subscribers.
Split Screen – Simultaneously view a category's search results and the full text of a selected document.

Go: Browse Contents Search Options: Edit | Search Within Results | Add to My Folders | Clear | Go to Hit
Results in: U.S. Income (3) | State Tax Portfolios (1) | Sales & Use Tax Portfolios (1) | State Guides & Navigators (2) | News (54) | Laws, Regs, Agency Docs (37) | Cases (21)
Add to My Folders
Share
Split Screen

<GO> LINKS AND <GO> PAGES

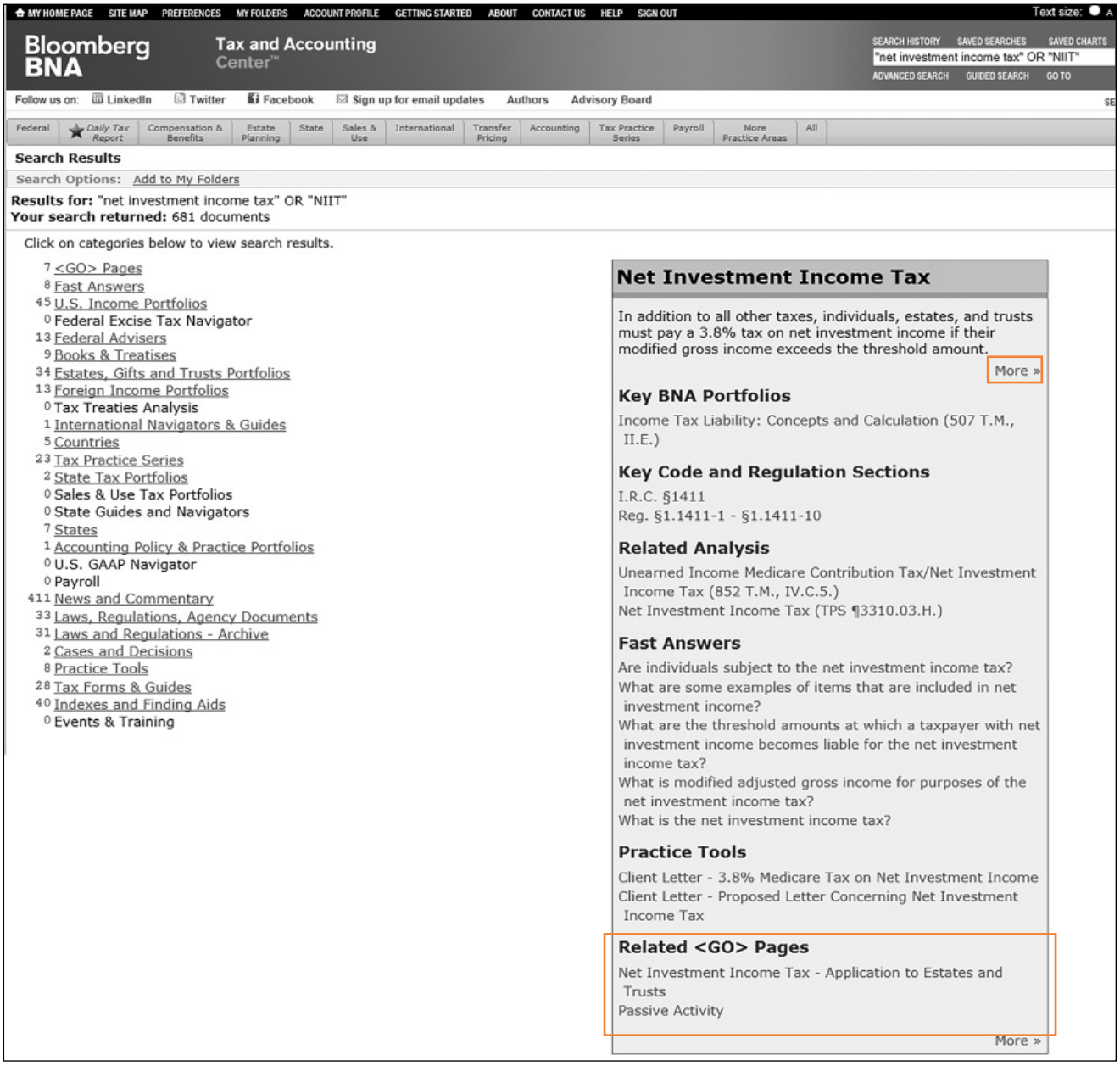
<GO> Links and **<GO> Pages** are accessed through **Search Results** and cover critical federal, state, and international tax topics, including all 50 states, and nearly 115 countries. Use **Quick Search** (see page 11) to search all content included in a subscription. The **<GO> Links** frame displays with the **Search Results** list and provides a shortcut to related Tax Management Portfolio analysis, Code sections, regulations, Fast Answers, news, and more. The **<GO> Links** frame also links to the available **<GO> Pages**. The topical **<GO> Pages** display editor-selected, topic-specific content providing background on key aspects of the topic with links to related Bloomberg BNA content.

Note: Subscription access is required to access content that is linked from **<GO> Links** and **<GO> Pages**.

Launch a **Quick Search** (see page 11) of all content included in a subscription by entering search terms, a tax topic, an I.R.C. section, country, or state in the **Quick Search** text box.

<GO> Links display next to the **Search Results** list.

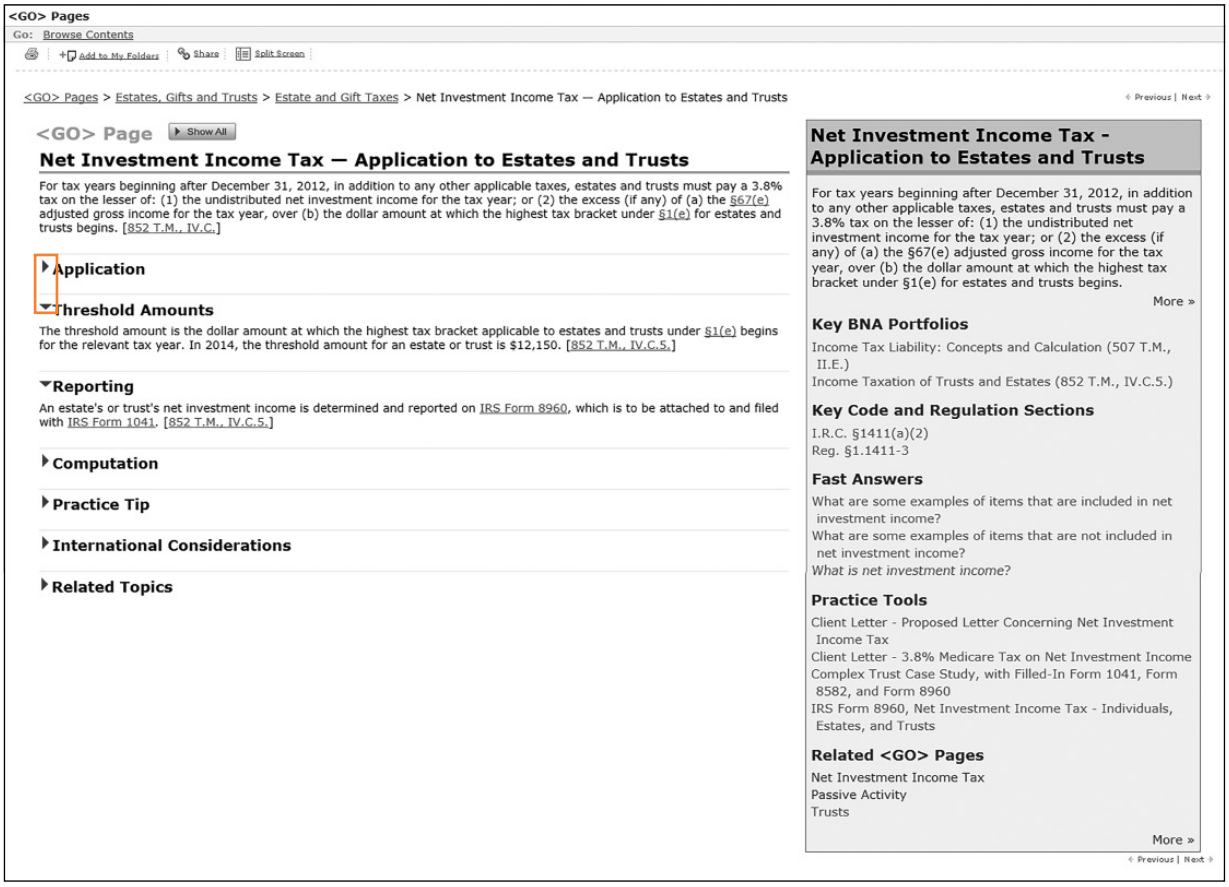
Find links to **<GO> Pages** in the **<GO> Links** frame or click **More** to view the **<GO> Page.**


MY HOME PAGE SITE MAP PREFERENCES MY FOLDERS ACCOUNT PROFILE GETTING STARTED ABOUT CONTACT US HELP SIGN OUT
Text size:
Bloomberg BNA
Tax and Accounting Center
SEARCH HISTORY SAVED SEARCHES SAVED CHARTS
"net investment income tax" OR "NIIT"
ADVANCED SEARCH GUIDED SEARCH GO TO
Follow us on: LinkedIn Twitter Facebook Sign up for email updates Authors Advisory Board
Federal Daily Tax Report Compensation & Benefits Estate Planning State Sales & Use International Transfer Pricing Accounting Tax Practice Series Payroll More Practice Areas All
Search Results
Search Options: Add to My Folders
Results for: "net investment income tax" OR "NIIT"
Your search returned: 681 documents
Click on categories below to view search results.
7 <GO> Pages
8 Fast Answers
45 U.S. Income Portfolios
0 Federal Excise Tax Navigator
13 Federal Advisers
9 Books & Treatises
34 Estates, Gifts and Trusts Portfolios
13 Foreign Income Portfolios
0 Tax Treaties Analysis
1 International Navigators & Guides
5 Countries
23 Tax Practice Series
2 State Tax Portfolios
0 Sales & Use Tax Portfolios
0 State Guides and Navigators
7 States
1 Accounting Policy & Practice Portfolios
0 U.S. GAAP Navigator
0 Payroll
411 News and Commentary
33 Laws, Regulations, Agency Documents
31 Laws and Regulations - Archive
2 Cases and Decisions
8 Practice Tools
28 Tax Forms & Guides
40 Indexes and Finding Aids
0 Events & Training
Net Investment Income Tax
In addition to all other taxes, individuals, estates, and trusts must pay a 3.8% tax on net investment income if their modified gross income exceeds the threshold amount.
More »
Key BNA Portfolios
Income Tax Liability: Concepts and Calculation (507 T.M., II.E.)
Key Code and Regulation Sections
I.R.C. §1411
Reg. §1.1411-1 - §1.1411-10
Related Analysis
Unearned Income Medicare Contribution Tax/Net Investment Income Tax (852 T.M., IV.C.5.)
Net Investment Income Tax (TPS ¶3310.03.H.)
Fast Answers
Are individuals subject to the net investment income tax?
What are some examples of items that are included in net investment income?
What are the threshold amounts at which a taxpayer with net investment income becomes liable for the net investment income tax?
What is modified adjusted gross income for purposes of the net investment income tax?
What is the net investment income tax?
Practice Tools
Client Letter - 3.8% Medicare Tax on Net Investment Income
Client Letter - Proposed Letter Concerning Net Investment Income Tax
Related <GO> Pages
Net Investment Income Tax - Application to Estates and Trusts
Passive Activity
More »

<GO> PAGES

Topical **<GO> Pages** display editor-selected content specific to the topic searched.

Click the blue arrows ▶ to display explanatory information and linked Bloomberg BNA Portfolio and Tax Practice content, related I.R.C. sections, regulations, practice tips, and state and international considerations. **<GO> Pages** are continually updated and reflect standard tax topics and the evolving industry-wide hot topics.


<GO> Pages
Go: Browse Contents
Add to My Folders
Share
Split Screen
<GO> Pages > Estates, Gifts and Trusts > Estate and Gift Taxes > Net Investment Income Tax — Application to Estates and Trusts
Previous | Next
<GO> Page
Show All
Net Investment Income Tax — Application to Estates and Trusts
For tax years beginning after December 31, 2012, in addition to any other applicable taxes, estates and trusts must pay a 3.8% tax on the lesser of: (1) the undistributed net investment income for the tax year; or (2) the excess (if any) of (a) the §67(e) adjusted gross income for the tax year, over (b) the dollar amount at which the highest tax bracket under §1(e) for estates and trusts begins. [852 T.M., IV.C.]
Application
Threshold Amounts
The threshold amount is the dollar amount at which the highest tax bracket applicable to estates and trusts under §1(e) begins for the relevant tax year. In 2014, the threshold amount for an estate or trust is $12,150. [852 T.M., IV.C.5.]
Reporting
An estate's or trust's net investment income is determined and reported on IRS Form 8960, which is to be attached to and filed with IRS Form 1041. [852 T.M., IV.C.5.]
Computation
Practice Tip
International Considerations
Related Topics
Net Investment Income Tax - Application to Estates and Trusts
For tax years beginning after December 31, 2012, in addition to any other applicable taxes, estates and trusts must pay a 3.8% tax on the lesser of: (1) the undistributed net investment income for the tax year; or (2) the excess (if any) of (a) the §67(e) adjusted gross income for the tax year, over (b) the dollar amount at which the highest tax bracket under §1(e) for estates and trusts begins.
More »
Key BNA Portfolios
Income Tax Liability: Concepts and Calculation (507 T.M., II.E.)
Income Taxation of Trusts and Estates (852 T.M., IV.C.5.)
Key Code and Regulation Sections
I.R.C. §1411(a)(2)
Reg. §1.1411-3
Fast Answers
What are some examples of items that are included in net investment income?
What are some examples of items that are not included in net investment income?
What is net investment income?
Practice Tools
Client Letter - Proposed Letter Concerning Net Investment Income Tax
Client Letter - 3.8% Medicare Tax on Net Investment Income
Complex Trust Case Study, with Filled-In Form 1041, Form 8582, and Form 8960
IRS Form 8960, Net Investment Income Tax - Individuals, Estates, and Trusts
Related <GO> Pages
Net Investment Income Tax
Passive Activity
Trusts
More »
Previous | Next

BCITE ANALYSIS

The **BCite℠ Analysis** frame displays on selected case pages. Use **BCite℠** to validate whether a federal or state case is still "good law," follow a case through the court system, and locate cases in higher courts and/or with similar facts or law at issue.

To view the list of cases cited within an opinion, see the **Table of Authorities**. Click any of the icon indicators to display the detailed tabbed display of **Citing Case Analysis**, **Direct History**, and **Table of Authorities**.

Toggle On/Off

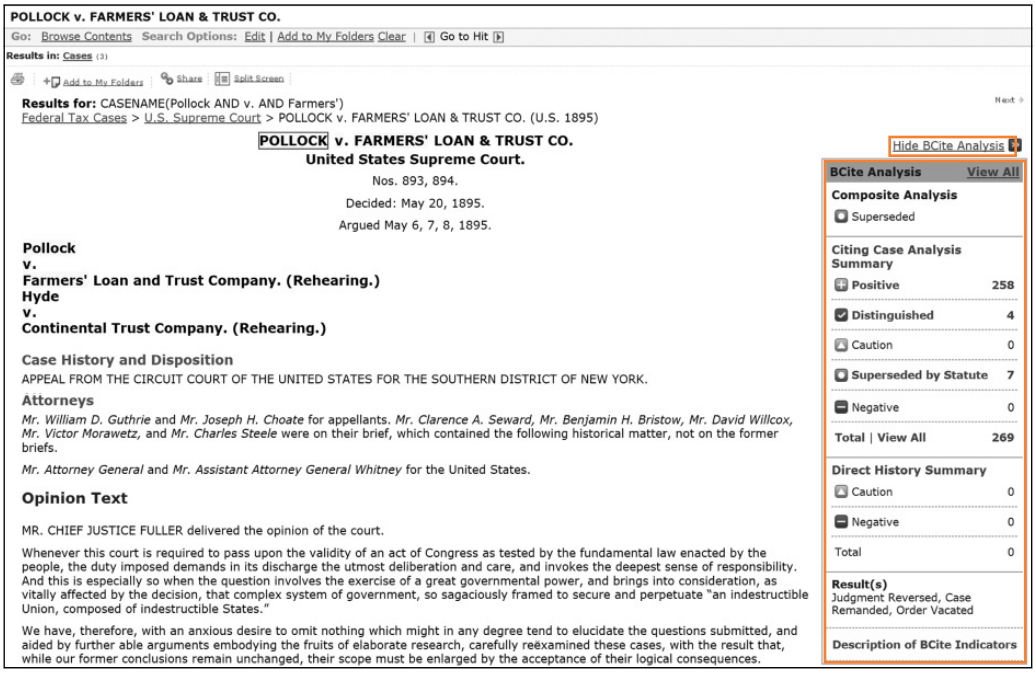
Click Hide BCite Analysis to toggle **BCite℠** on/off.

BCite℠ Indicators

Click **Description of BCite Indicators** located at the bottom of the frame to view the definition list for the citator's indicators.

Composite Analysis Summary

Displays the overall analysis of the case.


POLLOCK v. FARMERS' LOAN & TRUST CO.
Go: Browse Contents Search Options: Edit | Add to My Folders Clear | Go to Hit
Results in: Cases (3)
Add to My Folders Share Split Screen
Results for: CASENAME(Pollock AND v. AND Farmers')
Federal Tax Cases > U.S. Supreme Court > POLLOCK v. FARMERS' LOAN & TRUST CO. (U.S. 1895)
POLLOCK v. FARMERS' LOAN & TRUST CO.
United States Supreme Court.
Nos. 893, 894.
Decided: May 20, 1895.
Argued May 6, 7, 8, 1895.
Pollock
v.
Farmers' Loan and Trust Company. (Rehearing.)
Hyde
v.
Continental Trust Company. (Rehearing.)
Case History and Disposition
APPEAL FROM THE CIRCUIT COURT OF THE UNITED STATES FOR THE SOUTHERN DISTRICT OF NEW YORK.
Attorneys
Mr. William D. Guthrie and Mr. Joseph H. Choate for appellants. Mr. Clarence A. Seward, Mr. Benjamin H. Bristow, Mr. David Willcox, Mr. Victor Morawetz, and Mr. Charles Steele were on their brief, which contained the following historical matter, not on the former briefs.
Mr. Attorney General and Mr. Assistant Attorney General Whitney for the United States.
Opinion Text
MR. CHIEF JUSTICE FULLER delivered the opinion of the court.
Whenever this court is required to pass upon the validity of an act of Congress as tested by the fundamental law enacted by the people, the duty imposed demands in its discharge the utmost deliberation and care, and invokes the deepest sense of responsibility. And this is especially so when the question involves the exercise of a great governmental power, and brings into consideration, as vitally affected by the decision, that complex system of government, so sagaciously framed to secure and perpetuate "an indestructible Union, composed of indestructible States."
We have, therefore, with an anxious desire to omit nothing which might in any degree tend to elucidate the questions submitted, and aided by further able arguments embodying the fruits of elaborate research, carefully reëxamined these cases, with the result that, while our former conclusions remain unchanged, their scope must be enlarged by the acceptance of their logical consequences.
Hide BCite Analysis
BCite Analysis View All
Composite Analysis
Superseded
Citing Case Analysis Summary
Positive 258
Distinguished 4
Caution 0
Superseded by Statute 7
Negative 0
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Direct History Summary
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Result(s)
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Case Name
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5. Cited Supreme Court of the United States North Georgia Finishing, Inc. v. Di-Chem, Inc., 419 U.S. 601, 95 S. Ct. 719, 42 L. Ed. 2d 751 (1975)
6. Cited Supreme Court of the United States United States v. Jackson, 390 U.S. 570, 88 S. Ct. 1209, 20 L. Ed. 2d 138 (1968)

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HIGHLIGHTS
IRS Watching for 'High-Risk' FATCA Cases as Implementation Gears Up
INTERNAL REVENUE SERVICE
The IRS will be watching for "high-risk" cases of possible violations of the Foreign Account Tax Compliance Act, Large Business & International Division Commissioner Douglas O'Donnell says. In a discussion with reporters on a range of LB&I priorities, O'Donnell says the IRS is expecting the majority of FATCA information to start arriving in the fall and is still organizing its overall exam focus. More » ... O'Donnell also says the IRS faces several challenges as country-by-country reporting requirements come into play in 2015, including how to use the information produced. More »
Final Foreign Credit Splitter Rules Praised as 'Reasonable Approach'
New final IRS rules (T.D. 9710) on foreign tax credit splitter transactions win praise from practitioners as a reasonable approach to implementing tax code Section 909, designed to curb such splitters. The rules keep the exclusive list of "splitter arrangements" in the temporary regulations (T.D. 9577) the IRS put forth three years ago, with some changes. "Considering the breadth of Section 909 as enacted, this exclusive list approach is a reasonable balance behind Section 909 and the need for administrable rules," John Harrington, a partner at Dentons LLP, tells Bloomberg BNA. More »
Finance Committee Looks to Advance Low-Hanging Fruit With Markup
Lawmakers looking to boost foreign investment in U.S. real estate will move legislation through the Senate Finance Committee tomorrow. The measure, backed by Sens. Enzi and Menendez, is one of 17 bills scheduled for markup. Others deal with energy, alcohol and the military, among other subjects. All the bills represent low-hanging fruit that Senate Finance Committee Chairman Hatch says he hopes to advance early in the year. More »
Hard Cider, Propane Sectors Poised to Win as Senate Ponders Tax Break
Makers of propane and hard cider are among the likely winners as the Senate Finance Committee prepares to vote this week on a package of tax breaks. Cider makers would benefit from an expansion of the definition of hard cider, which is taxed more lightly than wine or champagne. The propane measure would lower the excise tax on propane so that it is no longer taxed at the same rate as more energy-dense gasoline. More »
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Tax Credits **27 DTR G-6**

Foreign Credit Splitter Rules Praised As 'Reasonable Approach' to Section 909

By Alison Bennett

Feb. 9 — New final IRS rules on foreign tax credit splitter transactions won praise from practitioners as a reasonable approach to implementing tax code Section 909, designed to curb such splitters.

Issued Feb. 9, the rules (T.D. 9710, RIN 1545-BK50) keep the exclusive list of "splitter arrangements" in the temporary regulations the IRS put forth three years ago, with some changes (27 DTR G-10, 2/10/12).

BNA Snapshot

Development: Final IRS rules to implement tax code Section 909, curb foreign tax credit splitter transactions.

Takeaway: The rules, little changed from previously proposed rules, are seen as a balanced way to implement the law.

"Considering the breadth of Section 909 as enacted, this exclusive list approach is a reasonable balance behind Section 909 and the need for administrable rules," John Harrington, a partner at Dentons LLP told Bloomberg BNA Feb. 9.

Both Harrington and Rebecca Rosenberg, a tax principal in the Washington National Tax Services practice at PricewaterhouseCoopers LLP, praised the timing of the rules, issued on the same day the temporary rules expired.

"Practitioners were waiting with bated breath to see if final regs would be issued before the deadline," Rosenberg said.

Changes

The final rules include some changes to the rules addressing splitter arrangements involving reverse hybrids, loss sharing, and hybrid instruments.

Harrington said new examples for reverse hybrids and hybrid instruments are helpful, "if only to illustrate the technical rules and definitions." He said changes in the final rules "are not always taxpayer favorable."

However, he said, the changes do clear up questions such as how to take into account loss carryovers, and whether taxpayers should use foreign law or U.S. law in determining whether a hybrid splitter arrangement exists.

Harrington said the IRS hasn't yet changed interim rules for identifying related income and split taxes, and said more specific guidance is needed. The agency said in the preamble to the final regulations that it is continuing to work on such guidance.

Harrington told Bloomberg BNA that even though the final regulations apply only to defined situations, taxpayers and practitioners need to keep them in mind when undertaking cross-border transactions and planning.

Bigger Picture

For example, he said, if a foreign subsidiary has discretion whether to carry back a loss, it needs to take into account whether failing to carry back that loss could subject its group to the regulations.

"Similarly, a liquidation or disposition could cause foreign taxes to be suspended permanently unless all of the related income is distributed or otherwise recognized beforehand or as part of the transaction," he said.

PwC's Rosenberg pointed out a change in the IRS's analysis of loss-sharing splitters. She said the new final regulations explicitly state that a usable shared loss includes only a loss that the loss-generating group could have used itself in a prior or current taxable year.

In other words, she said, "the regulations now make clear that a group's ability to potentially use its own loss in a future taxable year is irrelevant in determining a usable shared loss."

Rosenberg said that does raise the question, however, of "whether the IRS and Treasury think that the temp regs' definition of usable shared losses included losses that might be carried back to prior years."

Many thought that the temporary regulations didn't contain such a rule, the PwC practitioner, an international tax specialist, said.

She also pointed out that the IRS finalized temporary regulations under tax code Section 704 as part of the Feb. 9 package. "These Section 704 regulations are relevant to the interpretation of partnership interbranch payment splitters under the 909 regs," Rosenberg said.

T.D. 9710 will be effective when it appears in the Federal Register Feb. 10.

To contact the reporter on this story: Alison Bennett in Washington at abennett@bna.com

To contact the editor responsible for this story: Brett Ferguson at bferguson@bna.com

For More Information

Text of T.D. 9710 is in TaxCore.

Related Articles

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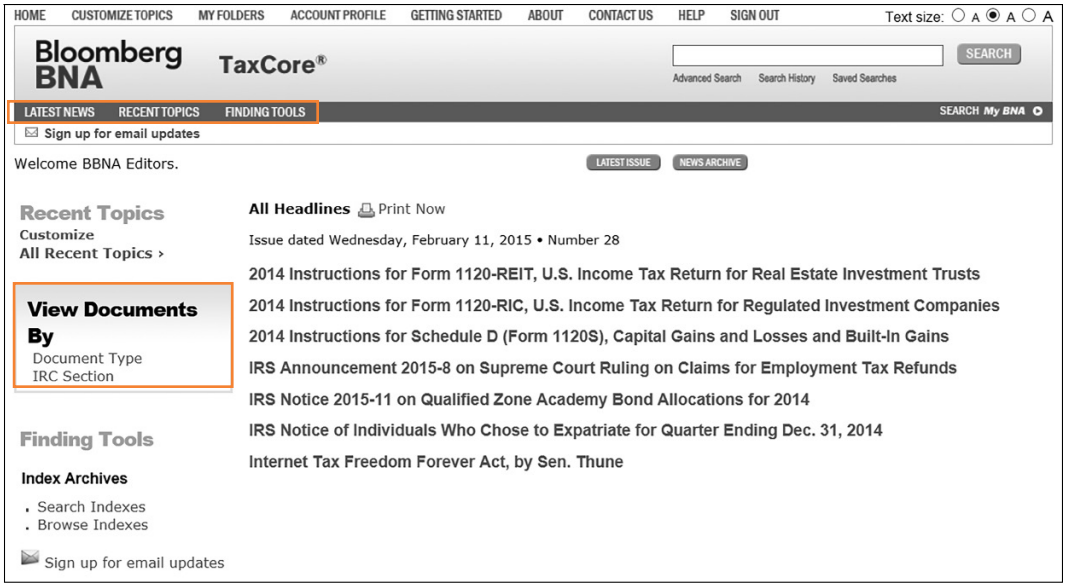

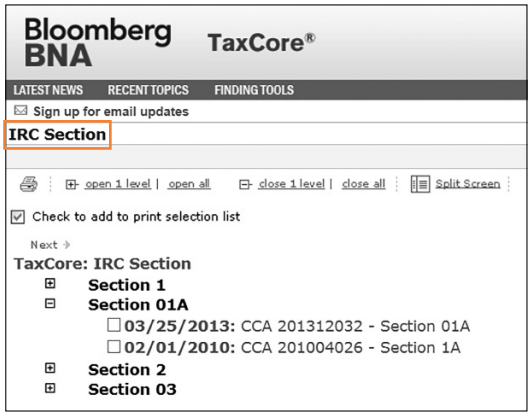

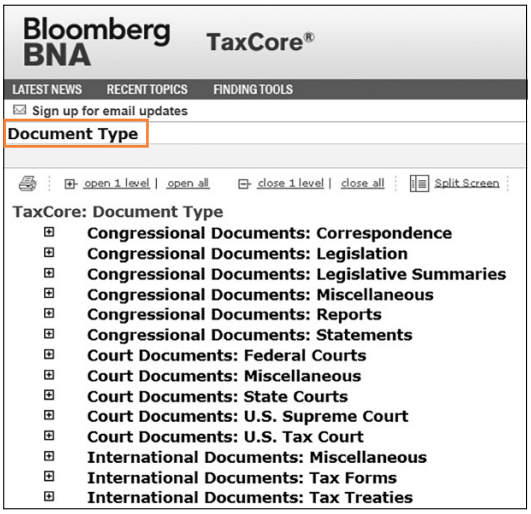

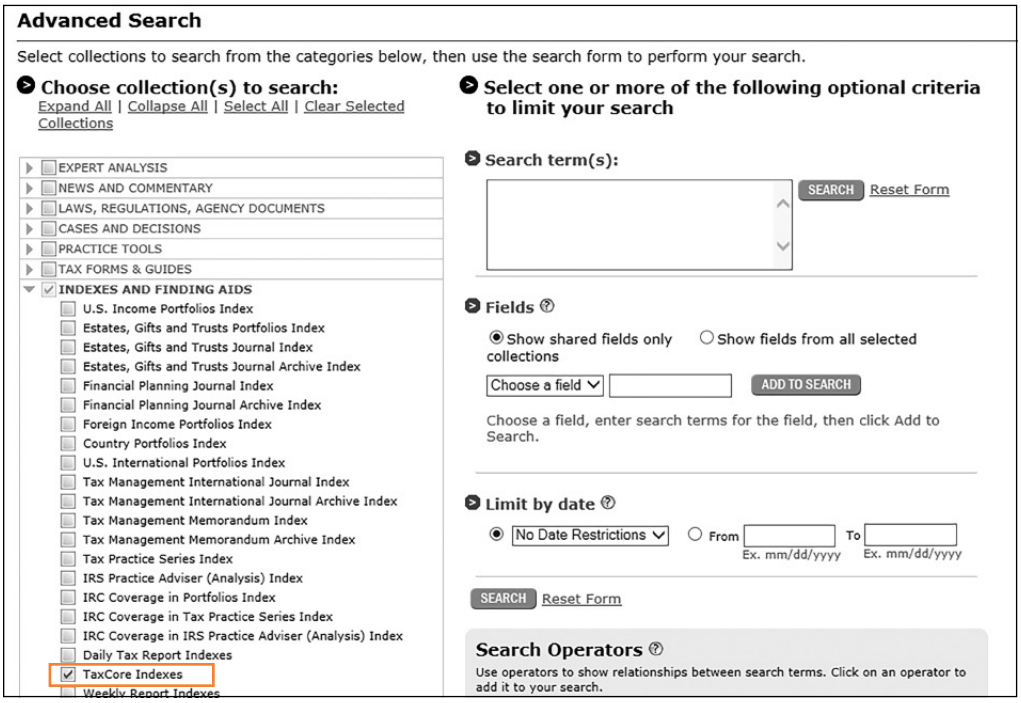
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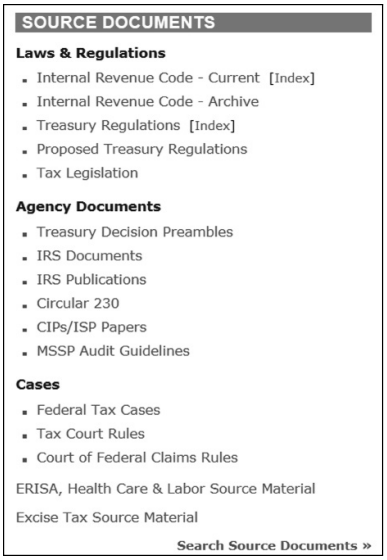

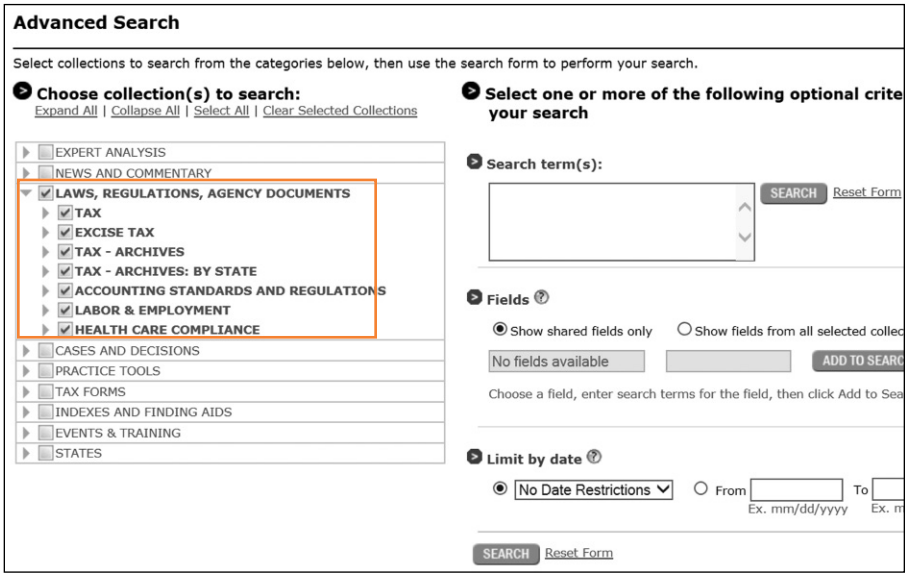

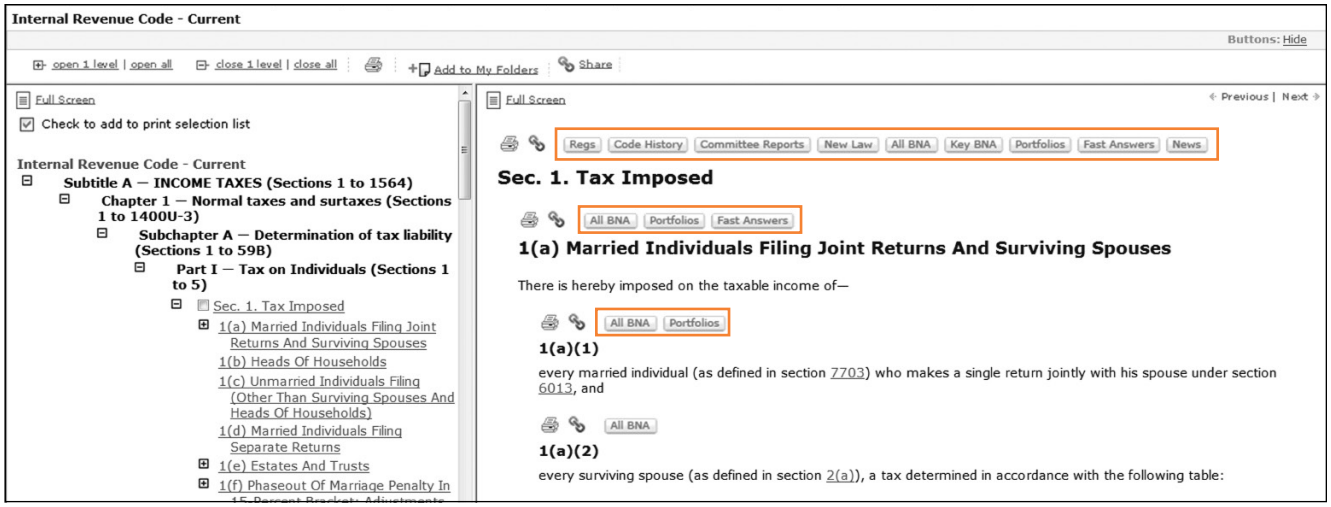
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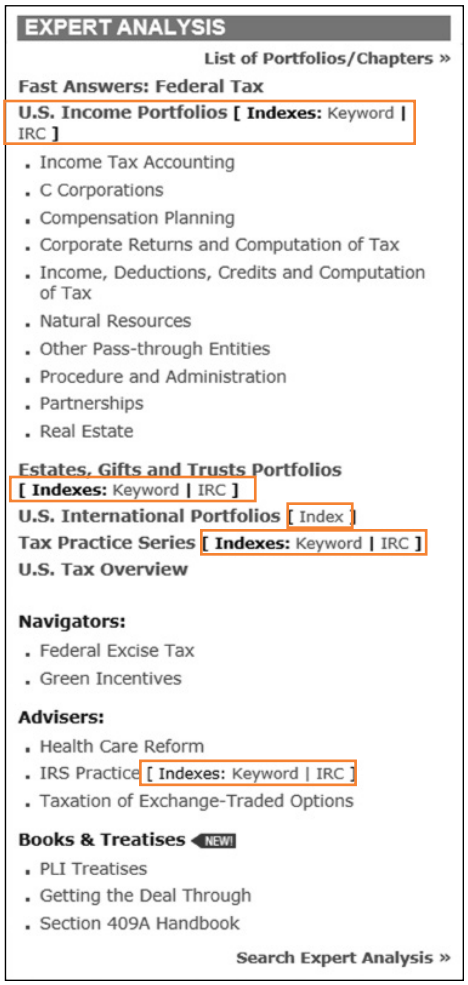

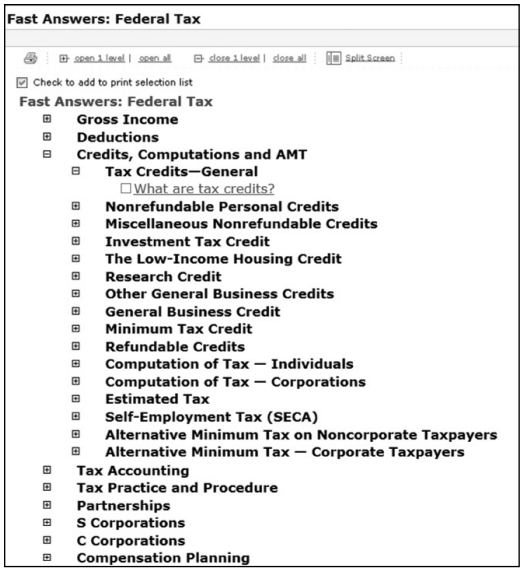

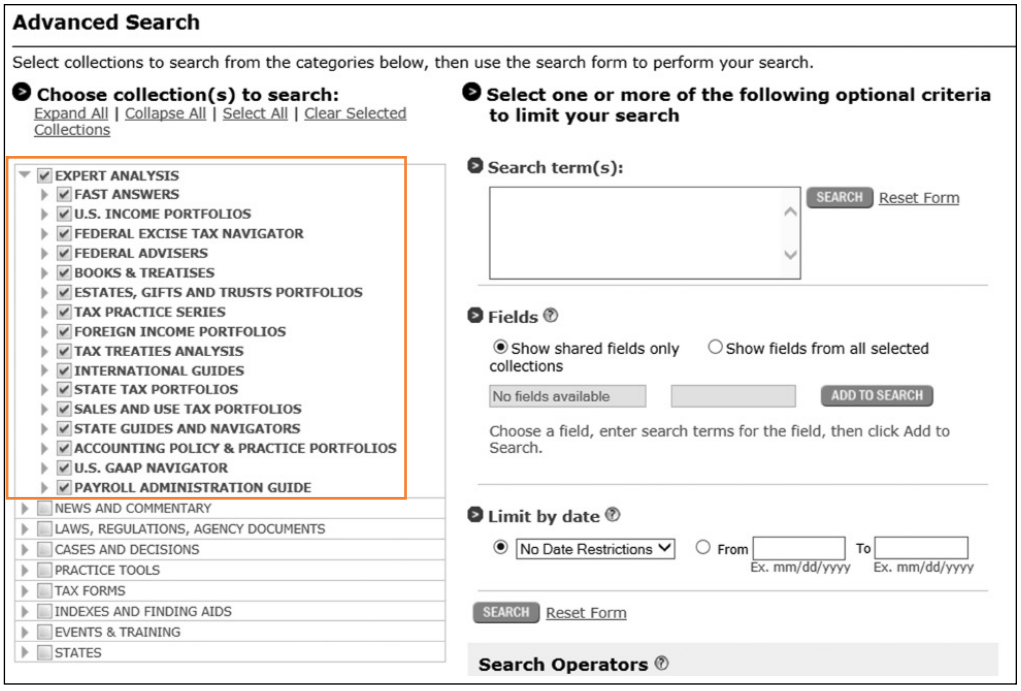

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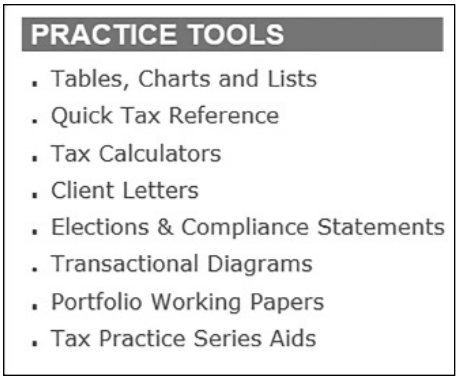

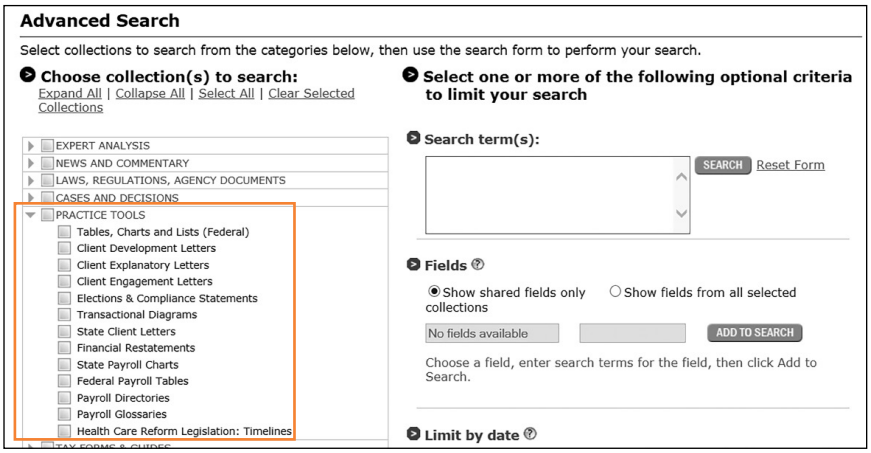
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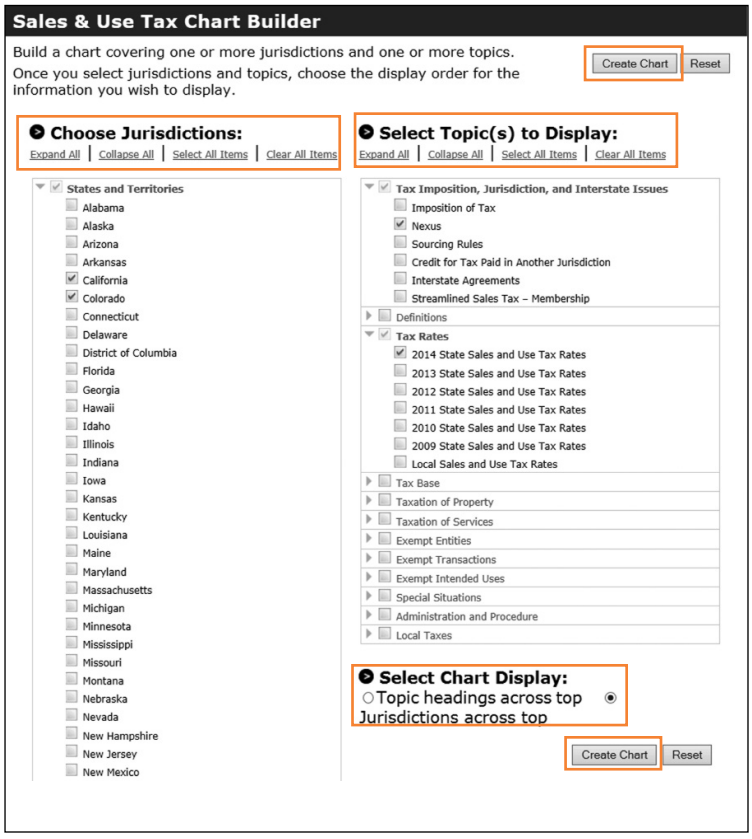

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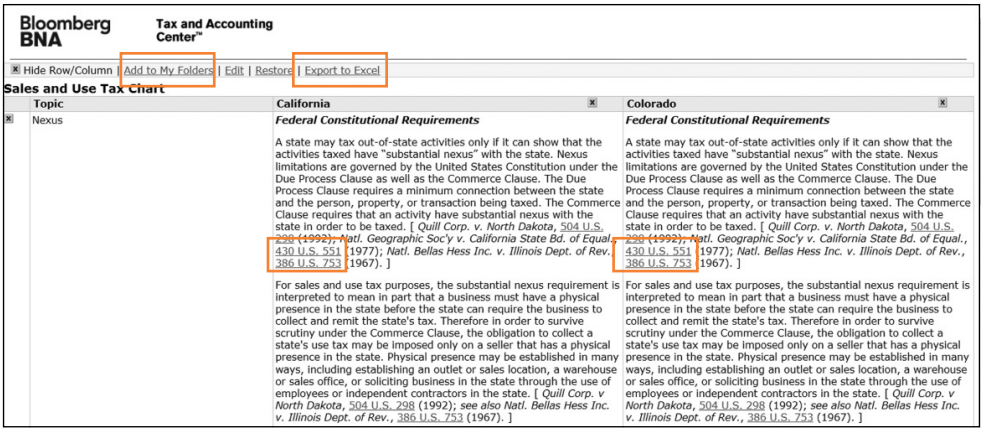
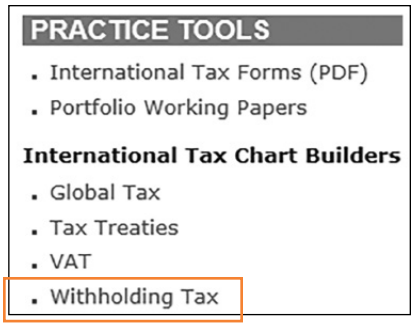
The chart displays with an option to **Export to Excel**.

To print the chart, export it to Excel and print using your browser's print function.


Bloomberg BNA
Tax and Accounting Center™
Hide Row/Column | Add to My Folders | Edit | Restore | Export to Excel
Sales and Use Tax Chart
Topic
California
Colorado
Nexus
Federal Constitutional Requirements
A state may tax out-of-state activities only if it can show that the activities taxed have "substantial nexus" with the state. Nexus limitations are governed by the United States Constitution under the Due Process Clause as well as the Commerce Clause. The Due Process Clause requires a minimum connection between the state and the person, property, or transaction being taxed. The Commerce Clause requires that an activity have substantial nexus with the state in order to be taxed. [Quill Corp. v. North Dakota, 504 U.S. 298 (1992); Natl. Geographic Soc'y v. California State Bd. of Equal., 430 U.S. 551 (1977); Natl. Bellas Hess Inc. v. Illinois Dept. of Rev., 386 U.S. 753 (1967).]
For sales and use tax purposes, the substantial nexus requirement is interpreted to mean in part that a business must have a physical presence in the state before the state can require the business to collect and remit the state's tax. Therefore in order to survive scrutiny under the Commerce Clause, the obligation to collect a state's use tax may be imposed only on a seller that has a physical presence in the state. Physical presence may be established in many ways, including establishing an outlet or sales location, a warehouse or sales office, or soliciting business in the state through the use of employees or independent contractors in the state. [Quill Corp. v North Dakota, 504 U.S. 298 (1992); see also Natl. Bellas Hess Inc. v. Illinois Dept. of Rev., 386 U.S. 753 (1967).]

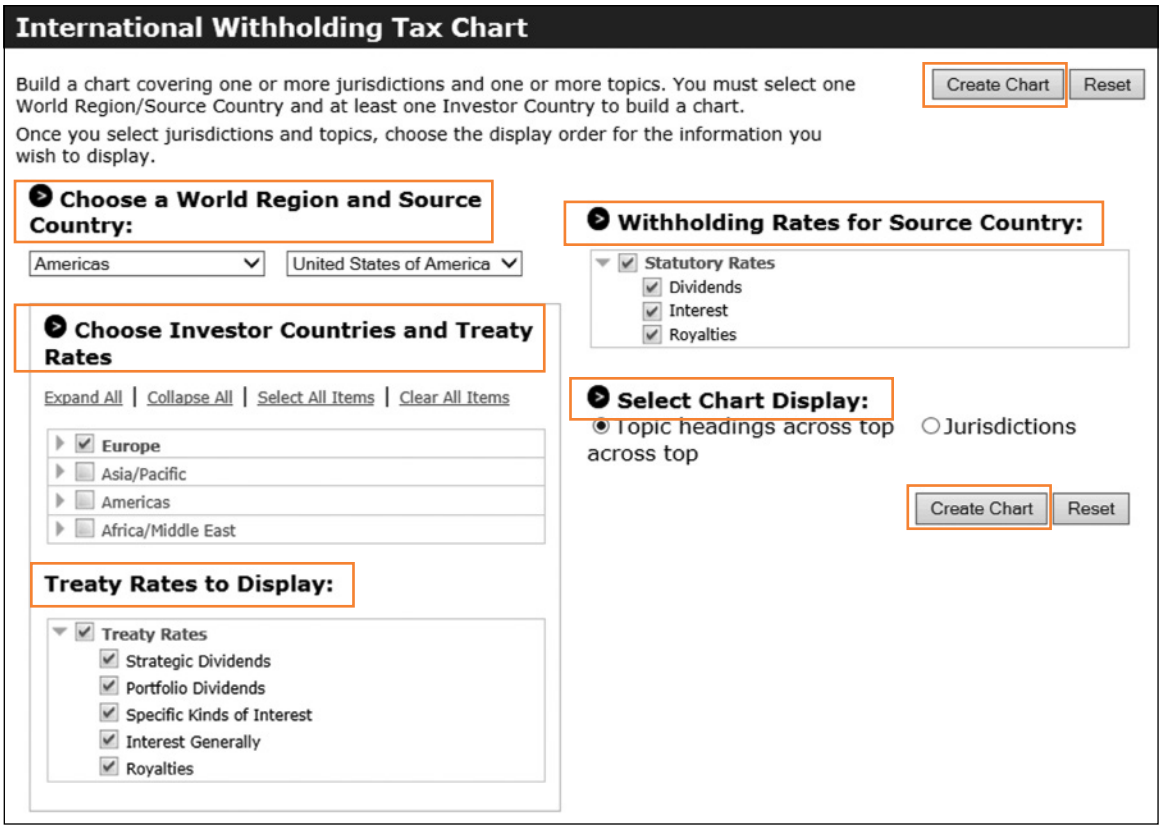
Withholding Tax Chart Builder

Go to the **International** tab to access the **Withholding Tax Chart Builder** on on the **Practice Tools** frame. The **Withholding Tax Chart Builder** includes 114 countries, and allows you to build a chart displaying the host-investor tax liability as outlined in the applicable treaty(ies).



To build a chart:

- Choose a **World Region and Source Country**.
- Choose **Withholding Rates for Source Country**.
- Choose **Investor Countries and Treaty Rates**.
- Select **Chart Display**.
- Click **Create Chart**.

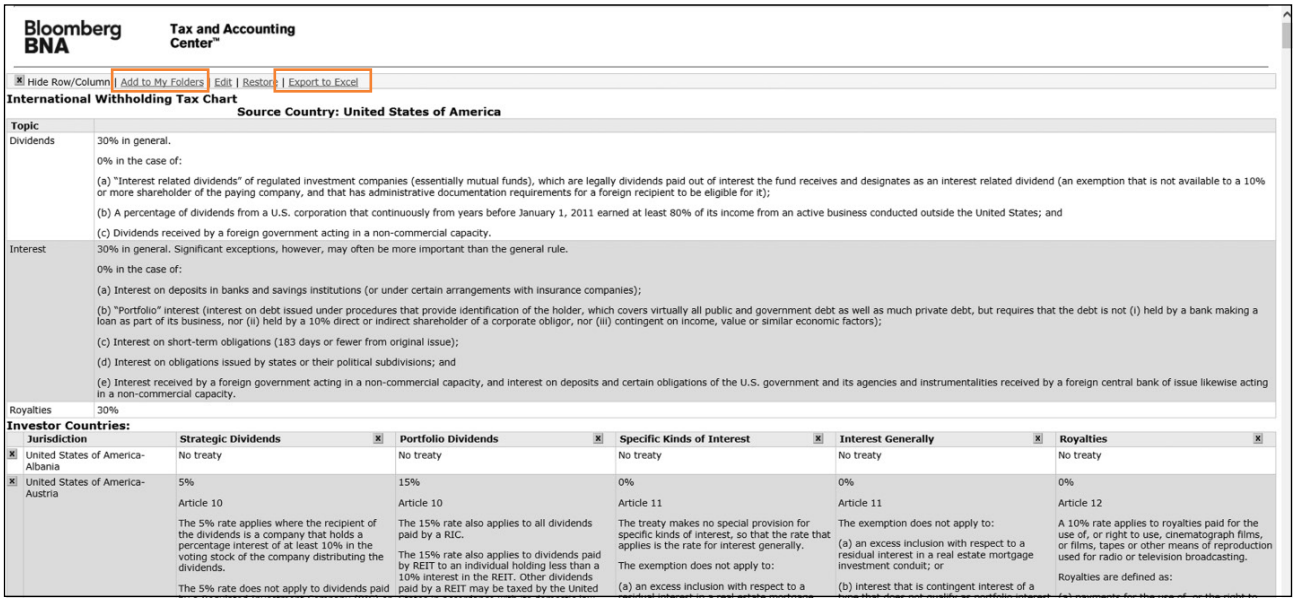

International Withholding Tax Chart
Build a chart covering one or more jurisdictions and one or more topics. You must select one World Region/Source Country and at least one Investor Country to build a chart.
Once you select jurisdictions and topics, choose the display order for the information you wish to display.
Create Chart
Reset
Choose a World Region and Source Country:
Americas
United States of America
Withholding Rates for Source Country:
Statutory Rates
Dividends
Interest
Royalties
Choose Investor Countries and Treaty Rates
Expand All | Collapse All | Select All Items | Clear All Items
Europe
Asia/Pacific
Americas
Africa/Middle East
Select Chart Display:
Topic headings across top
Jurisdictions across top
Treaty Rates to Display:
Treaty Rates
Strategic Dividends
Portfolio Dividends
Specific Kinds of Interest
Interest Generally
Royalties

Withholding Tax Chart Builder
(continued)

The chart display includes added commentary, updating the treaty language.

To save the chart, click **Add to My Folders** (see page 10).

Export to Excel to manipulate the data and print.



Bloomberg BNA **Tax and Accounting Center™**

Hide Row/Column | Add to My Folders | Edit | Restore | Export to Excel

International Withholding Tax Chart

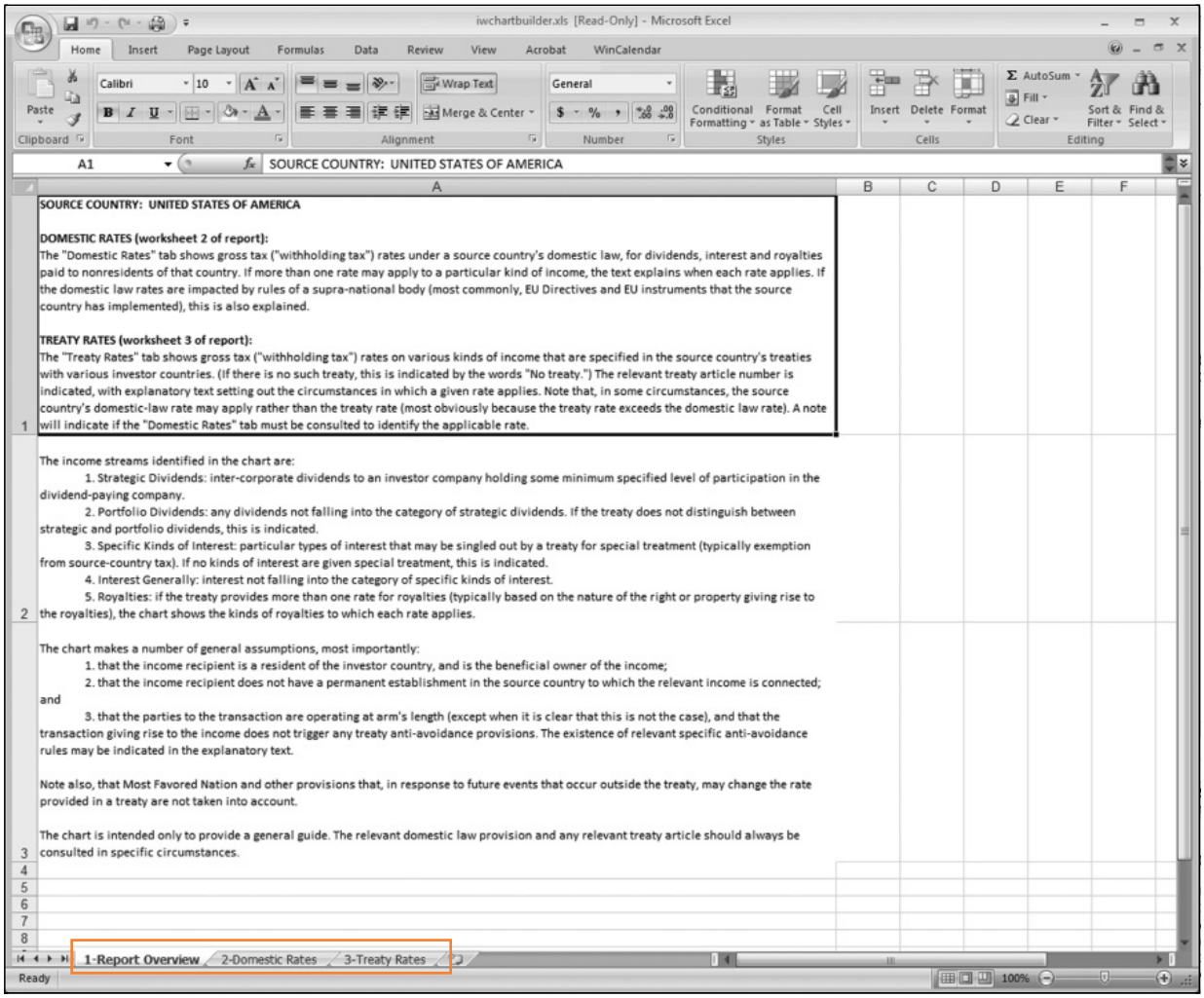
Source Country: United States of America

Topic	
Dividends	30% in general. 0% in the case of: (a) "Interest related dividends" of regulated investment companies (essentially mutual funds), which are legally dividends paid out of interest the fund receives and designates as an interest related dividend (an exemption that is not available to a 10% or more shareholder of the paying company, and that has administrative documentation requirements for a foreign recipient to be eligible for it); (b) A percentage of dividends from a U.S. corporation that continuously from years before January 1, 2011 earned at least 80% of its income from an active business conducted outside the United States; and (c) Dividends received by a foreign government acting in a non-commercial capacity.
Interest	30% in general. Significant exceptions, however, may often be more important than the general rule. 0% in the case of: (a) Interest on deposits in banks and savings institutions (or under certain arrangements with insurance companies); (b) "Portfolio" interest (interest on debt issued under procedures that provide identification of the holder, which covers virtually all public and government debt as well as much private debt, but requires that the debt is not (I) held by a bank making a loan as part of its business, nor (ii) held by a 10% direct or indirect shareholder of a corporate obligor, nor (iii) contingent on income, value or similar economic factors); (c) Interest on short-term obligations (183 days or fewer from original issue); (d) Interest on obligations issued by states or their political subdivisions; and (e) Interest received by a foreign government acting in a non-commercial capacity, and interest on deposits and certain obligations of the U.S. government and its agencies and instrumentalities received by a foreign central bank of issue likewise acting in a non-commercial capacity.
Royalties	30%

Investor Countries:

Jurisdiction	Strategic Dividends	Portfolio Dividends	Specific Kinds of Interest	Interest Generally	Royalties
United States of America-Albania	No treaty	No treaty	No treaty	No treaty	No treaty
United States of America-Austria	5% Article 10 The 5% rate applies where the recipient of the dividends is a company that holds a percentage interest of at least 10% in the voting stock of the company distributing the dividends. The 5% rate does not apply to dividends paid	15% Article 10 The 15% rate also applies to all dividends paid by a RIC. The 15% rate also applies to dividends paid by REIT to an individual holding less than a 10% interest in the REIT. Other dividends paid by a REIT may be taxed by the United	0% Article 11 The treaty makes no special provision for specific kinds of interest, so that the rate that applies is the rate for interest generally. The exemption does not apply to: (a) an excess inclusion with respect to a	0% Article 11 The exemption does not apply to: (a) an excess inclusion with respect to a residual interest in a real estate mortgage investment conduit; or (b) interest that is contingent interest of a	0% Article 12 A 10% rate applies to royalties paid for the use of, or right to use, cinematograph films, or films, tapes or other means of reproduction used for radio or television broadcasting. Royalties are defined as:

Tabs organizing the information and commentary are added to the Excel spreadsheet at the bottom of the chart.



iwchartbuilder.xls [Read-Only] - Microsoft Excel

Home | Insert | Page Layout | Formulas | Data | Review | View | Acrobat | WinCalendar

A1: SOURCE COUNTRY: UNITED STATES OF AMERICA

SOURCE COUNTRY: UNITED STATES OF AMERICA

DOMESTIC RATES (worksheet 2 of report):
The "Domestic Rates" tab shows gross tax ("withholding tax") rates under a source country's domestic law, for dividends, interest and royalties paid to nonresidents of that country. If more than one rate may apply to a particular kind of income, the text explains when each rate applies. If the domestic law rates are impacted by rules of a supra-national body (most commonly, EU Directives and EU instruments that the source country has implemented), this is also explained.

TREATY RATES (worksheet 3 of report):
The "Treaty Rates" tab shows gross tax ("withholding tax") rates on various kinds of income that are specified in the source country's treaties with various investor countries. (If there is no such treaty, this is indicated by the words "No treaty.") The relevant treaty article number is indicated, with explanatory text setting out the circumstances in which a given rate applies. Note that, in some circumstances, the source country's domestic-law rate may apply rather than the treaty rate (most obviously because the treaty rate exceeds the domestic law rate). A note will indicate if the "Domestic Rates" tab must be consulted to identify the applicable rate.

The income streams identified in the chart are:
1. Strategic Dividends: inter-corporate dividends to an investor company holding some minimum specified level of participation in the dividend-paying company.
2. Portfolio Dividends: any dividends not falling into the category of strategic dividends. If the treaty does not distinguish between strategic and portfolio dividends, this is indicated.
3. Specific Kinds of Interest: particular types of interest that may be singled out by a treaty for special treatment (typically exemption from source-country tax). If no kinds of interest are given special treatment, this is indicated.
4. Interest Generally: interest not falling into the category of specific kinds of interest.
5. Royalties: if the treaty provides more than one rate for royalties (typically based on the nature of the right or property giving rise to the royalties), the chart shows the kinds of royalties to which each rate applies.

The chart makes a number of general assumptions, most importantly:
1. that the income recipient is a resident of the investor country, and is the beneficial owner of the income;
2. that the income recipient does not have a permanent establishment in the source country to which the relevant income is connected; and
3. that the parties to the transaction are operating at arm's length (except when it is clear that this is not the case), and that the transaction giving rise to the income does not trigger any treaty anti-avoidance provisions. The existence of relevant specific anti-avoidance rules may be indicated in the explanatory text.

Note also, that Most Favored Nation and other provisions that, in response to future events that occur outside the treaty, may change the rate provided in a treaty are not taken into account.

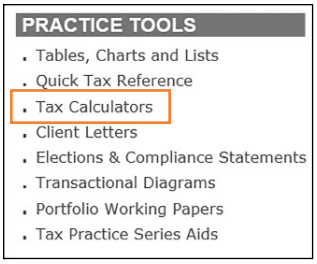
The chart is intended only to provide a general guide. The relevant domestic law provision and any relevant treaty article should always be consulted in specific circumstances.

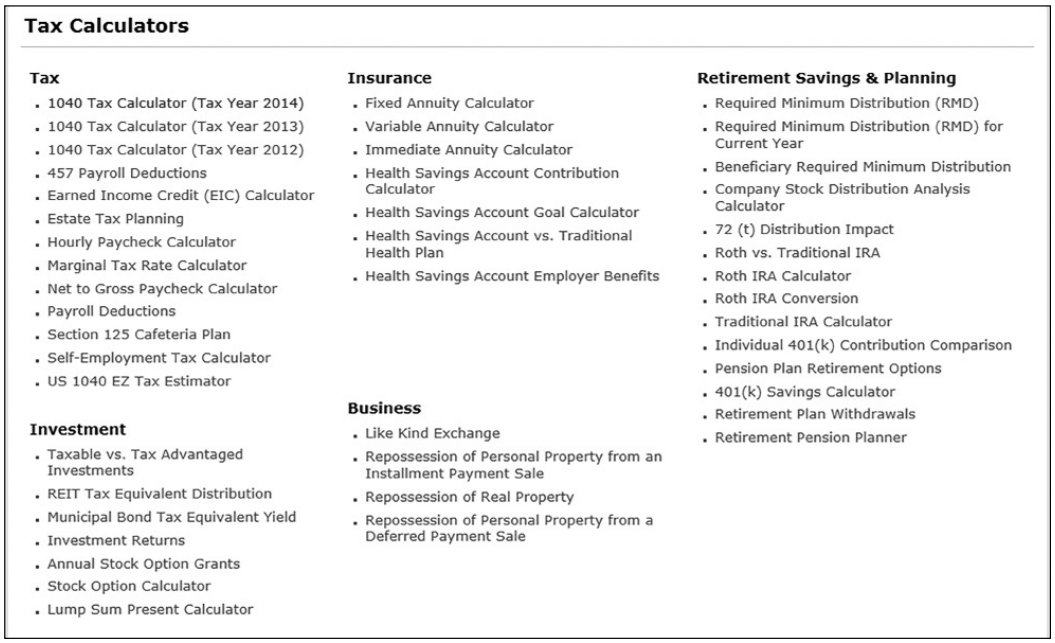
1-Report Overview | 2-Domestic Rates | 3-Treaty Rates

Ready

Tax Calculators

Access estimated values for a number of tax-related scenarios. Tax specific calculators include **1040 Tax**, **1040 EZ**, **Earned Income Credit**, **Payroll Deductions**, and more. **Retirement Savings & Planning**, **Insurance**, **Investment**, and **Business** calculators are also available. Click **Tax Calculators** on the **Practice Tools** frame.



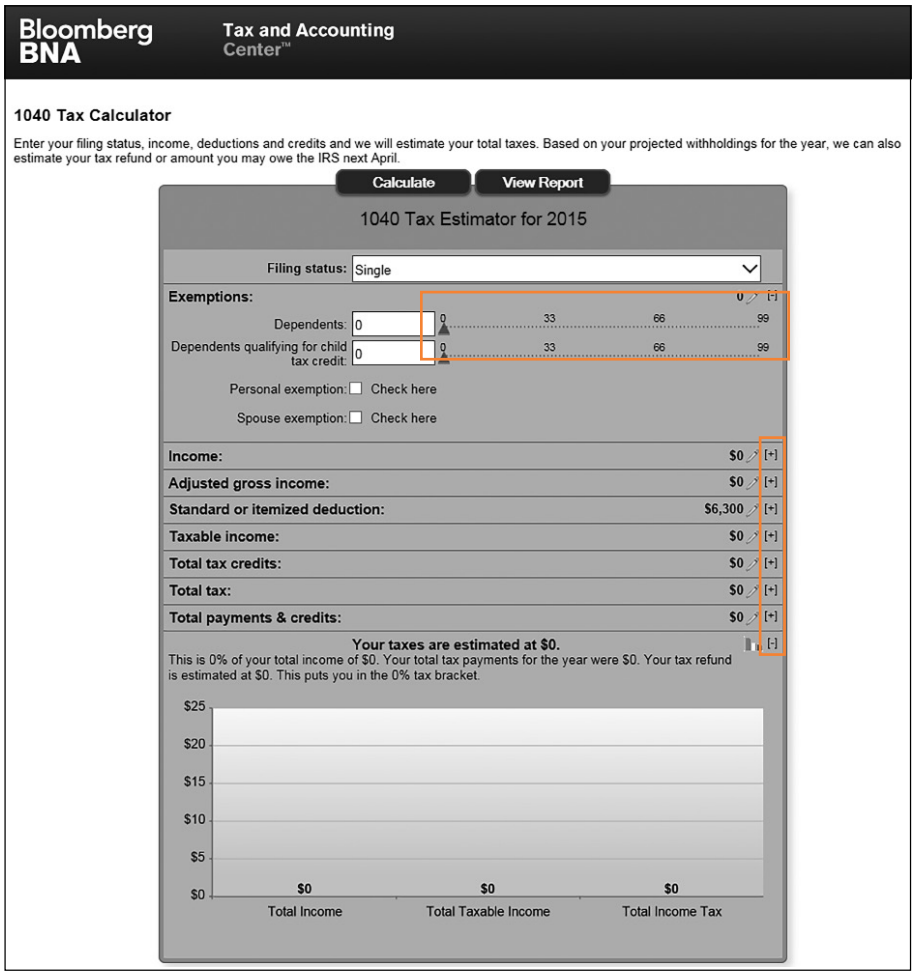

Tax Calculators
Tax
1040 Tax Calculator (Tax Year 2014)
1040 Tax Calculator (Tax Year 2013)
1040 Tax Calculator (Tax Year 2012)
457 Payroll Deductions
Earned Income Credit (EIC) Calculator
Estate Tax Planning
Hourly Paycheck Calculator
Marginal Tax Rate Calculator
Net to Gross Paycheck Calculator
Payroll Deductions
Section 125 Cafeteria Plan
Self-Employment Tax Calculator
US 1040 EZ Tax Estimator
Investment
Taxable vs. Tax Advantaged Investments
REIT Tax Equivalent Distribution
Municipal Bond Tax Equivalent Yield
Investment Returns
Annual Stock Option Grants
Stock Option Calculator
Lump Sum Present Calculator
Insurance
Fixed Annuity Calculator
Variable Annuity Calculator
Immediate Annuity Calculator
Health Savings Account Contribution Calculator
Health Savings Account Goal Calculator
Health Savings Account vs. Traditional Health Plan
Health Savings Account Employer Benefits
Business
Like Kind Exchange
Repossession of Personal Property from an Installment Payment Sale
Repossession of Real Property
Repossession of Personal Property from a Deferred Payment Sale
Retirement Savings & Planning
Required Minimum Distribution (RMD)
Required Minimum Distribution (RMD) for Current Year
Beneficiary Required Minimum Distribution
Company Stock Distribution Analysis Calculator
72 (t) Distribution Impact
Roth vs. Traditional IRA
Roth IRA Calculator
Roth IRA Conversion
Traditional IRA Calculator
Individual 401(k) Contribution Comparison
Pension Plan Retirement Options
401(k) Savings Calculator
Retirement Plan Withdrawals
Retirement Pension Planner

Click a link to open a tax calculator. Use the drop down menus and click the [+] signs to display the data entry fields. 1040 Tax Calculators are available for tax years 2012- 2015.

Make the data selections by entering the data, or using the sliders.

Make all selections.

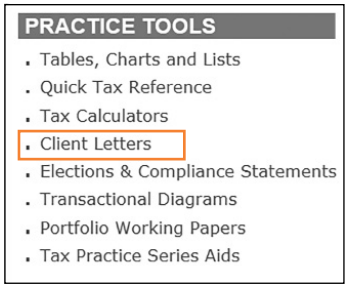
Click Calculate to calculate the tax, and View Report to print it.

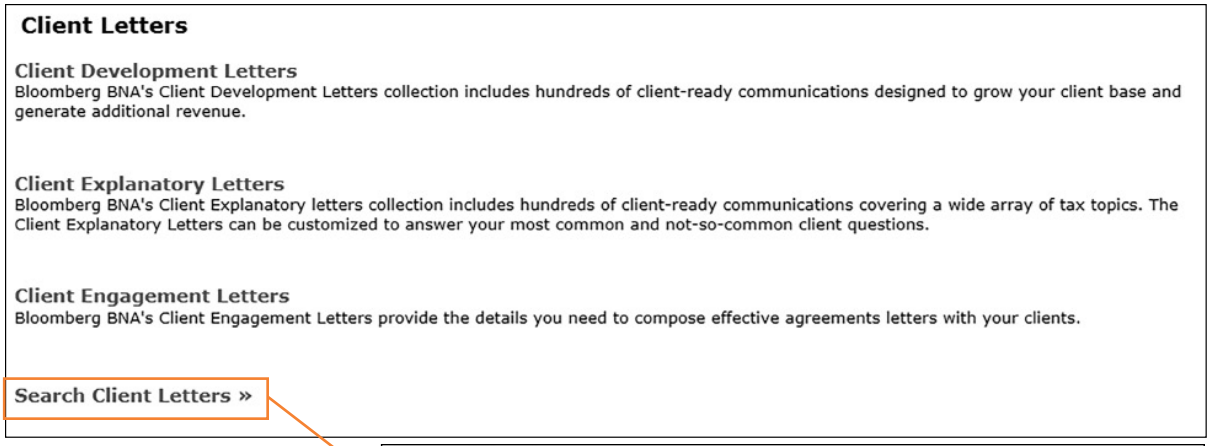

Bloomberg BNA
Tax and Accounting Center™
1040 Tax Calculator
Enter your filing status, income, deductions and credits and we will estimate your total taxes. Based on your projected withholdings for the year, we can also estimate your tax refund or amount you may owe the IRS next April.
Calculate
View Report
1040 Tax Estimator for 2015
Filing status: Single
Exemptions: $0 [+]
Dependents: 0
Dependents qualifying for child tax credit: 0
0 33 66 99
Personal exemption: Check here
Spouse exemption: Check here
Income: $0 [+]
Adjusted gross income: $0 [+]
Standard or itemized deduction: $6,300 [+]
Taxable income: $0 [+]
Total tax credits: $0 [+]
Total tax: $0 [+]
Total payments & credits: $0 [+]
Your taxes are estimated at $0.
This is 0% of your total income of $0. Your total tax payments for the year were $0. Your tax refund is estimated at $0. This puts you in the 0% tax bracket.
$25
$20
$15
$10
$5
$0
$0
$0
$0
Total Income
Total Taxable Income
Total Income Tax

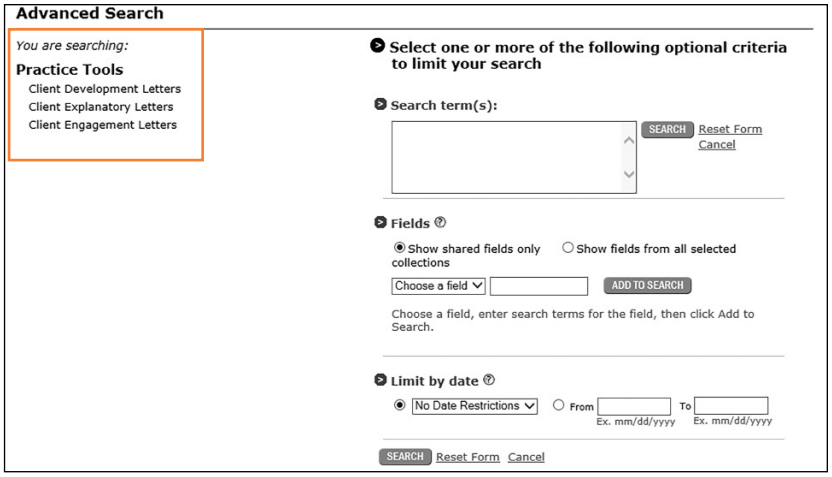
Client Letters

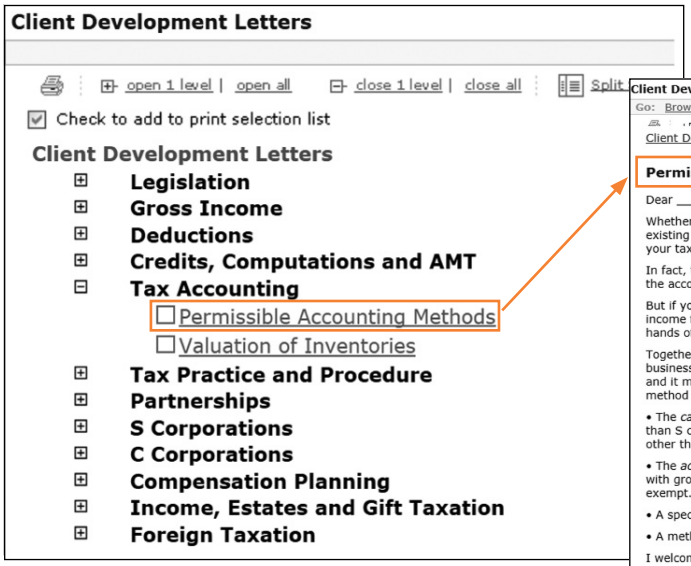
Client Development Letters, **Client Explanatory Letters**, and **Client Engagement Letters** can be customized and used for client communications.
Client Development Letters are designed specifically to generate additional revenue.
Client Explanatory Letters are sample letters that can be used to answer client questions and create a detailed explanation of a tax issue.
Client Engagement Letters provide details of how to compose effective agreement letters with your clients.

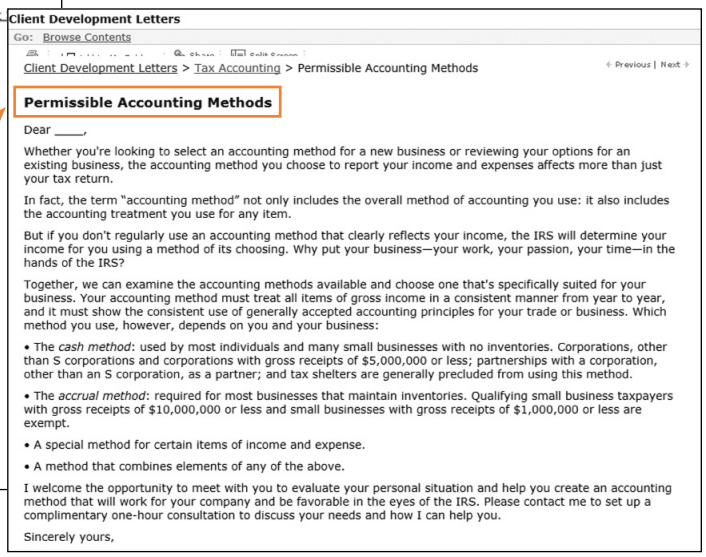
To search client letters, click **Search Client Letters** to launch a pre-loaded **Advanced Search** template, or use the **Advanced Search** template to search an individual collection (see page 11).




Client Letters
Client Development Letters
Bloomberg BNA's Client Development Letters collection includes hundreds of client-ready communications designed to grow your client base and generate additional revenue.
Client Explanatory Letters
Bloomberg BNA's Client Explanatory letters collection includes hundreds of client-ready communications covering a wide array of tax topics. The Client Explanatory Letters can be customized to answer your most common and not-so-common client questions.
Client Engagement Letters
Bloomberg BNA's Client Engagement Letters provide the details you need to compose effective agreements letters with your clients.
Search Client Letters »

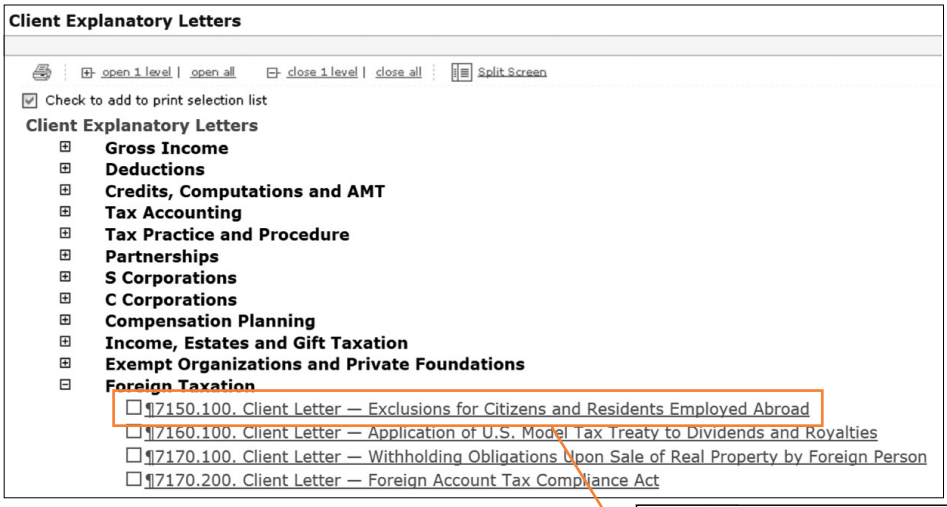





Client Development Letters
Go: Browse Contents
Client Development Letters > Tax Accounting > Permissible Accounting Methods
Previous | Next
Permissible Accounting Methods
Dear ____,
Whether you're looking to select an accounting method for a new business or reviewing your options for an existing business, the accounting method you choose to report your income and expenses affects more than just your tax return.
In fact, the term "accounting method" not only includes the overall method of accounting you use: it also includes the accounting treatment you use for any item.
But if you don't regularly use an accounting method that clearly reflects your income, the IRS will determine your income for you using a method of its choosing. Why put your business—your work, your passion, your time—in the hands of the IRS?
Together, we can examine the accounting methods available and choose one that's specifically suited for your business. Your accounting method must treat all items of gross income in a consistent manner from year to year, and it must show the consistent use of generally accepted accounting principles for your trade or business. Which method you use, however, depends on you and your business:
• The cash method: used by most individuals and many small businesses with no inventories. Corporations, other than S corporations and corporations with gross receipts of $5,000,000 or less; partnerships with a corporation, other than an S corporation, as a partner; and tax shelters are generally precluded from using this method.
• The accrual method: required for most businesses that maintain inventories. Qualifying small business taxpayers with gross receipts of $10,000,000 or less and small businesses with gross receipts of $1,000,000 or less are exempt.
• A special method for certain items of income and expense.
• A method that combines elements of any of the above.
I welcome the opportunity to meet with you to evaluate your personal situation and help you create an accounting method that will work for your company and be favorable in the eyes of the IRS. Please contact me to set up a complimentary one-hour consultation to discuss your needs and how I can help you.
Sincerely yours,

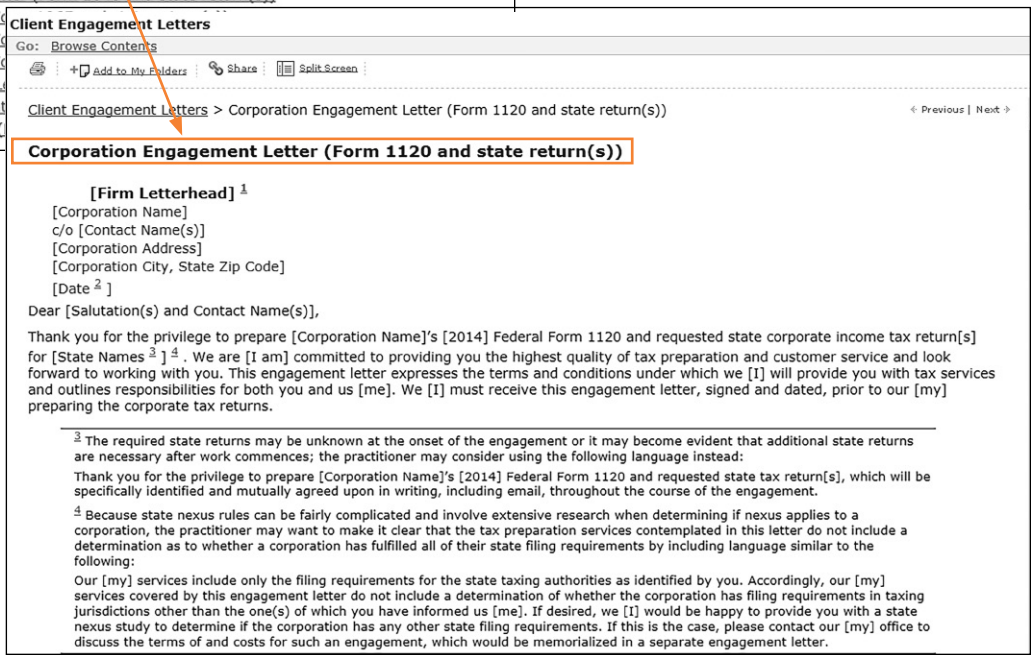
Client Letters
(continued)

The **Client Explanatory Letters** contain links to **Relevant Code Sections**.


Client Explanatory Letters
open 1 level | open all
close 1 level | close all
Split Screen
Check to add to print selection list
Client Explanatory Letters
Gross Income
Deductions
Credits, Computations and AMT
Tax Accounting
Tax Practice and Procedure
Partnerships
S Corporations
C Corporations
Compensation Planning
Income, Estates and Gift Taxation
Exempt Organizations and Private Foundations
Foreign Taxation
¶7150.100. Client Letter — Exclusions for Citizens and Residents Employed Abroad
¶7160.100. Client Letter — Application of U.S. Model Tax Treaty to Dividends and Royalties
¶7170.100. Client Letter — Withholding Obligations Upon Sale of Real Property by Foreign Person
¶7170.200. Client Letter — Foreign Account Tax Compliance Act

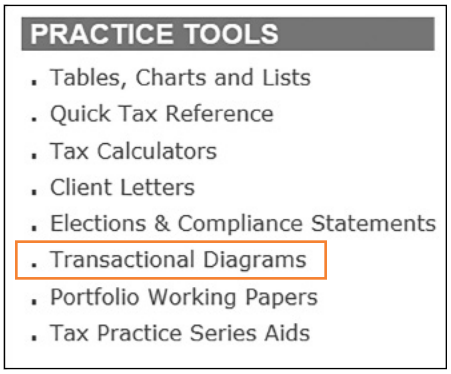
Client Explanatory Letters
Go: Browse Contents
References: Show
Client Explanatory Letters > Foreign Taxation > ¶7150.100. Client Letter — Exclusions for Citizens and Residents Employed Abroad
¶7150.100. Client Letter — Exclusions for Citizens and Residents Employed Abroad
Relevant Code Sections: 911
This letter is to remind you of our upcoming meeting and to give you some background information so that we may discuss your tax situation more constructively when we meet.
You told me that you are an airline pilot for a U.S. airline and that you earned income from flying abroad. You reside overseas. You are inquiring as to whether you may exclude, for U.S. tax purposes, any of the income you earned while working abroad throughout the year. You also wonder whether you may exclude other expenses that you incurred or that were paid on your behalf by your employer while flying abroad. The following is a general summary of the rules for excluding income earned and costs paid on your behalf while you were abroad.
Types of Exclusions:
Qualifying individuals are entitled to different types of exclusions under the tax law against income received while working abroad. Among these are the following: (i) a foreign earned income exclusion; (ii) a housing cost amount exclusion; and (iii) an exclusion for employer-provided meals and lodging.

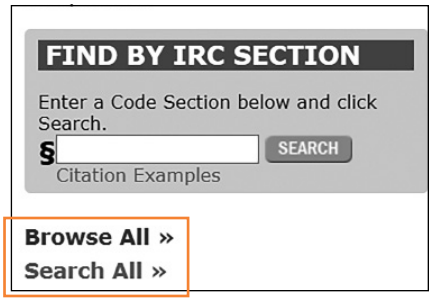
Client Engagement Letters
open 1 level | open all
close 1 level | close all
Split Screen
Check to add to print selection list
Client Engagement Letters
Corporation Engagement Letter (Form 1120 and state return(s))
Estate Engagement Letter (Form 706 or 1041 and state return(s))
Exempt Organization Engagement Letter (Form 990)
Exempt Organization UBIT Engagement Letter (Form 990-T and state return(s))
Exempt Organization with UBIT Engagement Letter (Form 990, 990-T, and state return(s))
Gift Tax Return Engagement Letter (Form 709 and state return(s))
Individual Engagement Letter (Form 1040 and state return(s))


Client Engagement Letters
Go: Browse Contents
Add to My Folders
Share
Split Screen
Client Engagement Letters > Corporation Engagement Letter (Form 1120 and state return(s))
Previous | Next
Corporation Engagement Letter (Form 1120 and state return(s))
[Firm Letterhead] 1
[Corporation Name]
c/o [Contact Name(s)]
[Corporation Address]
[Corporation City, State Zip Code]
[Date 2]
Dear [Salutation(s) and Contact Name(s)],
Thank you for the privilege to prepare [Corporation Name]'s [2014] Federal Form 1120 and requested state corporate income tax return[s] for [State Names 3] 4 . We are [I am] committed to providing you the highest quality of tax preparation and customer service and look forward to working with you. This engagement letter expresses the terms and conditions under which we [I] will provide you with tax services and outlines responsibilities for both you and us [me]. We [I] must receive this engagement letter, signed and dated, prior to our [my] preparing the corporate tax returns.
3 The required state returns may be unknown at the onset of the engagement or it may become evident that additional state returns are necessary after work commences; the practitioner may consider using the following language instead:
Thank you for the privilege to prepare [Corporation Name]'s [2014] Federal Form 1120 and requested state tax return[s], which will be specifically identified and mutually agreed upon in writing, including email, throughout the course of the engagement.
4 Because state nexus rules can be fairly complicated and involve extensive research when determining if nexus applies to a corporation, the practitioner may want to make it clear that the tax preparation services contemplated in this letter do not include a determination as to whether a corporation has fulfilled all of their state filing requirements by including language similar to the following:
Our [my] services include only the filing requirements for the state taxing authorities as identified by you. Accordingly, our [my] services covered by this engagement letter do not include a determination of whether the corporation has filing requirements in taxing jurisdictions other than the one(s) of which you have informed us [me]. If desired, we [I] would be happy to provide you with a state nexus study to determine if the corporation has any other state filing requirements. If this is the case, please contact our [my] office to discuss the terms of and costs for such an engagement, which would be memorialized in a separate engagement letter.

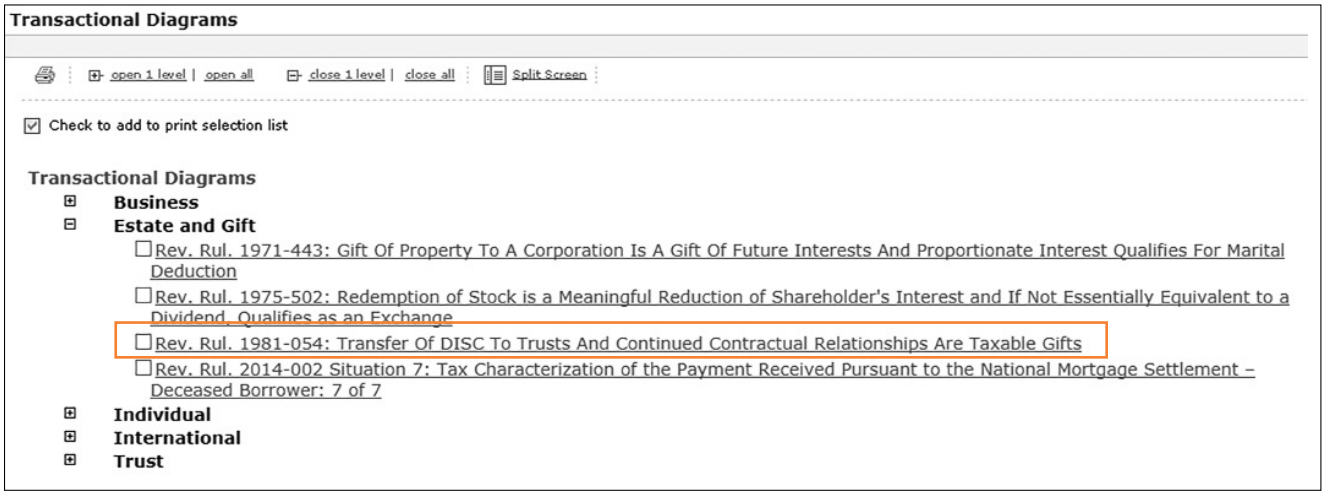
Transactional Diagrams

Collection of tax diagrams designed to help visualize complex fact patterns and transactions in IRS guidance, regulation examples, and Bloomberg BNA products. Access by I.R.C. Section number, or browse or search using the **Advanced Search** template (see page 11), to locate the relevant tranasctional diagram.

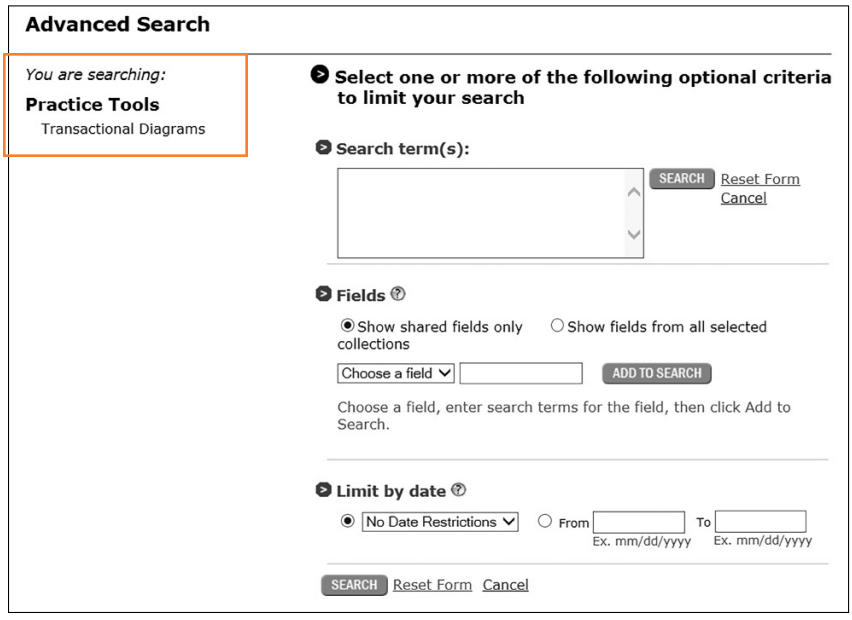




To browse, click **Browse All** and menu walk through the subject areas. Select the diagram you wish to view.

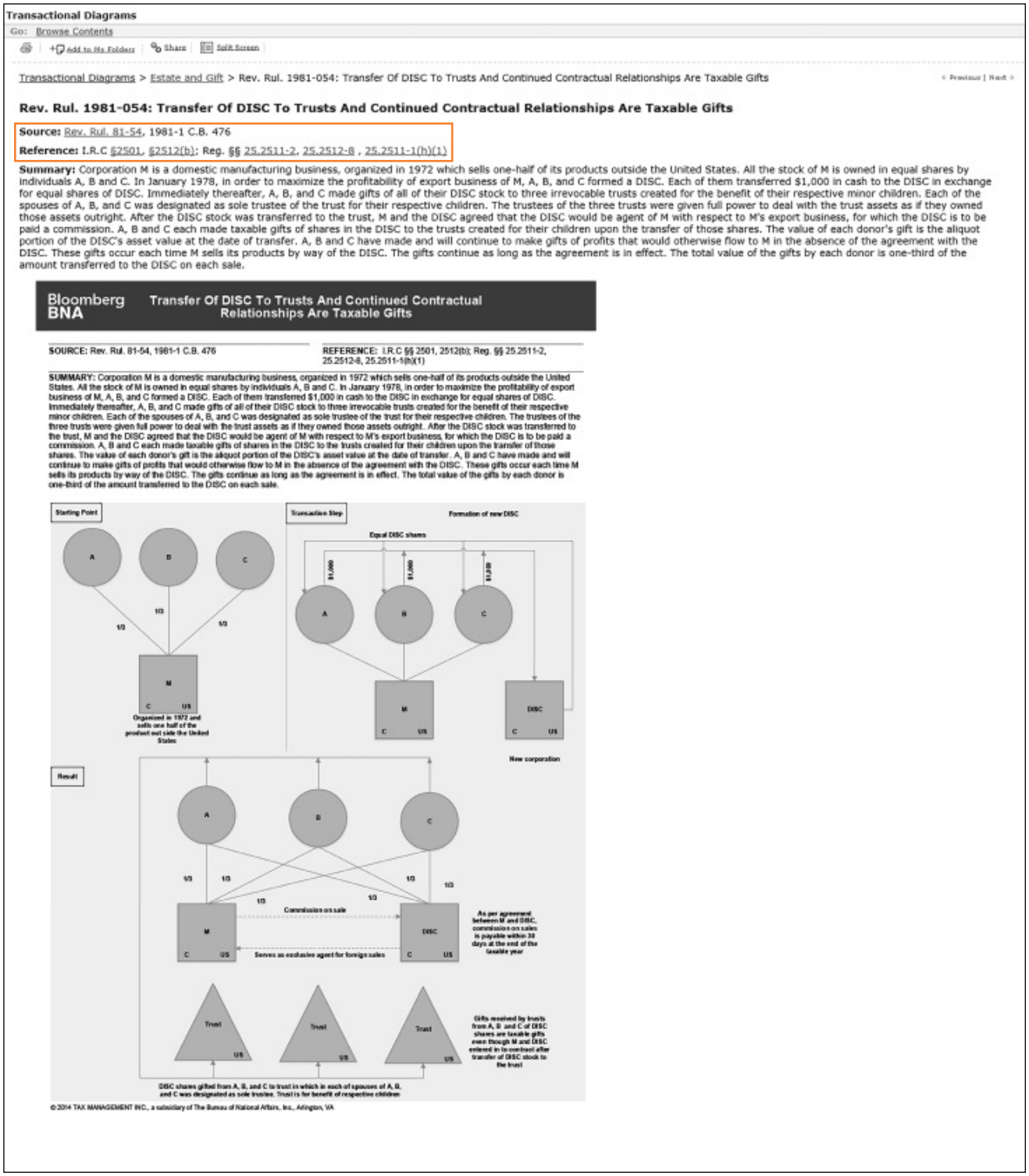

Transactional Diagrams
open 1 level | open all | close 1 level | close all | Split Screen
Check to add to print selection list
Transactional Diagrams
Business
Estate and Gift
Rev. Rul. 1971-443: Gift Of Property To A Corporation Is A Gift Of Future Interests And Proportionate Interest Qualifies For Marital Deduction
Rev. Rul. 1975-502: Redemption of Stock is a Meaningful Reduction of Shareholder's Interest and If Not Essentially Equivalent to a Dividend, Qualifies as an Exchange
Rev. Rul. 1981-054: Transfer Of DISC To Trusts And Continued Contractual Relationships Are Taxable Gifts
Rev. Rul. 2014-002 Situation 7: Tax Characterization of the Payment Received Pursuant to the National Mortgage Settlement – Deceased Borrower: 7 of 7
Individual
International
Trust

Click **Search All** to display a pre-loaded **Advanced Search** template.



Tranactional Digarams
(continued)

A visual depiction of the complex fact is displayed with linked **Source** and **Reference** information.


Transactional Diagrams
Go: Browse Contents
Add to My Folders
Share
Split Screen
Transactional Diagrams > Estate and Gift > Rev. Rul. 1981-054: Transfer Of DISC To Trusts And Continued Contractual Relationships Are Taxable Gifts
Previous | Next
Rev. Rul. 1981-054: Transfer Of DISC To Trusts And Continued Contractual Relationships Are Taxable Gifts
Source: Rev. Rul. 81-54, 1981-1 C.B. 476
Reference: I.R.C §2501, §2512(b); Reg. §§ 25.2511-2, 25.2512-8 , 25.2511-1(h)(1)
Summary: Corporation M is a domestic manufacturing business, organized in 1972 which sells one-half of its products outside the United States. All the stock of M is owned in equal shares by individuals A, B and C. In January 1978, in order to maximize the profitability of export business of M, A, B, and C formed a DISC. Each of them transferred $1,000 in cash to the DISC in exchange for equal shares of DISC. Immediately thereafter, A, B, and C made gifts of all of their DISC stock to three irrevocable trusts created for the benefit of their respective minor children. Each of the spouses of A, B, and C was designated as sole trustee of the trust for their respective children. The trustees of the three trusts were given full power to deal with the trust assets as if they owned those assets outright. After the DISC stock was transferred to the trust, M and the DISC agreed that the DISC would be agent of M with respect to M's export business, for which the DISC is to be paid a commission. A, B and C each made taxable gifts of shares in the DISC to the trusts created for their children upon the transfer of those shares. The value of each donor's gift is the aliquot portion of the DISC's asset value at the date of transfer. A, B and C have made and will continue to make gifts of profits that would otherwise flow to M in the absence of the agreement with the DISC. These gifts occur each time M sells its products by way of the DISC. The gifts continue as long as the agreement is in effect. The total value of the gifts by each donor is one-third of the amount transferred to the DISC on each sale.
Bloomberg BNA
Transfer Of DISC To Trusts And Continued Contractual Relationships Are Taxable Gifts
SOURCE: Rev. Rul. 81-54, 1981-1 C.B. 476
REFERENCE: I.R.C §§ 2501, 2512(b); Reg. §§ 25.2511-2, 25.2512-8, 25.2511-1(h)(1)
SUMMARY: Corporation M is a domestic manufacturing business, organized in 1972 which sells one-half of its products outside the United States. All the stock of M is owned in equal shares by individuals A, B and C. In January 1978, in order to maximize the profitability of export business of M, A, B, and C formed a DISC. Each of them transferred $1,000 in cash to the DISC in exchange for equal shares of DISC. Immediately thereafter, A, B, and C made gifts of all of their DISC stock to three irrevocable trusts created for the benefit of their respective minor children. Each of the spouses of A, B, and C was designated as sole trustee of the trust for their respective children. The trustees of the three trusts were given full power to deal with the trust assets as if they owned those assets outright. After the DISC stock was transferred to the trust, M and the DISC agreed that the DISC would be agent of M with respect to M's export business, for which the DISC is to be paid a commission. A, B and C each made taxable gifts of shares in the DISC to the trusts created for their children upon the transfer of those shares. The value of each donor's gift is the aliquot portion of the DISC's asset value at the date of transfer. A, B and C have made and will continue to make gifts of profits that would otherwise flow to M in the absence of the agreement with the DISC. These gifts occur each time M sells its products by way of the DISC. The gifts continue as long as the agreement is in effect. The total value of the gifts by each donor is one-third of the amount transferred to the DISC on each sale.
Starting Point
Transaction Step
Formation of new DISC
Equal DISC shares
$1,000
$1,000
$1,000
A
B
C
1/3
1/3
1/3
M
C
US
Organized in 1972 and sells one half of the product out side the United States
DISC
New corporation
Result
Commission on sale
As per agreement between M and DISC, commission on sales is payable within 30 days at the end of the taxable year
Serves as exclusive agent for foreign sales
Trust
Gifts received by trusts from A, B and C of DISC shares are taxable gifts even though M and DISC entered in to contract after transfer of DISC stock to the trust
DISC shares gifted from A, B, and C to trust in which in each of spouses of A, B, and C was designated as sole trustee. Trust is for benefit of respective children
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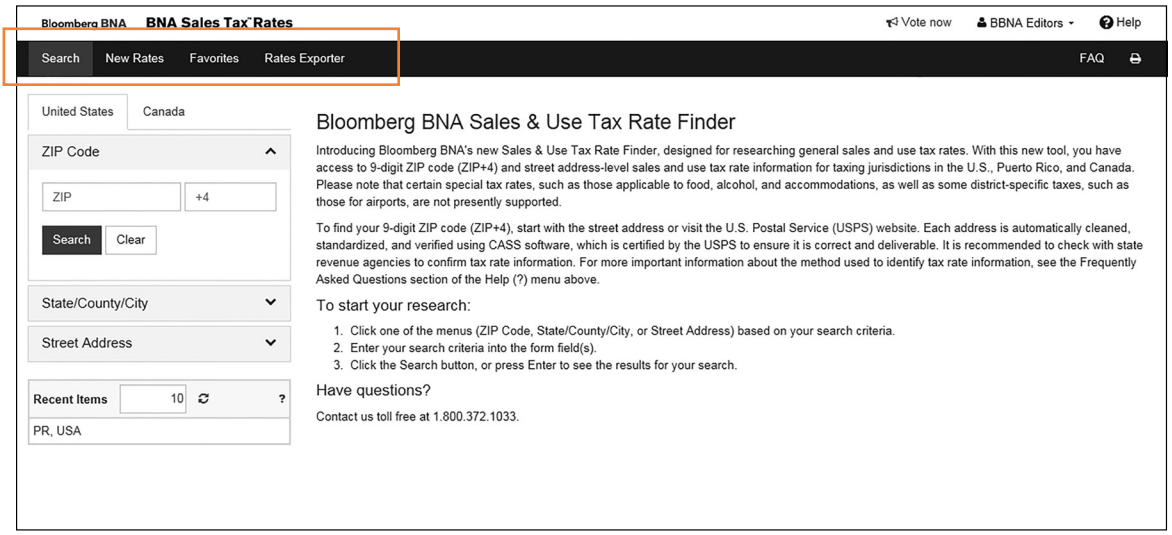
PRACTICE TOOLS - STATE

There are state-specific **Practice Tools**. Click the **State** tab, locate the **Practice Tools** frame and select from **Working Papers**, **Client Letters**, **Sales and Use Tax Rate Finder**, **State Tax Chart Builders**, **State Income Tax Sourcing Tool**, and **State Tax Nexus Tools** for **Corporate Income Tax Nexus**, **Sales and Use Tax Nexus**, and **Trust Nexus**.

Sales and Use Tax Rate Finder

Find tax rates for the U.S., selected territories, and Canada on the **Search** tab.
View all tax rates for the U.S. and Puerto Rico published during the previous 30 days on the **New Rates** tab.
Create an automatic or scheduled report of tax rate data using the **Rates Exporter** tab.

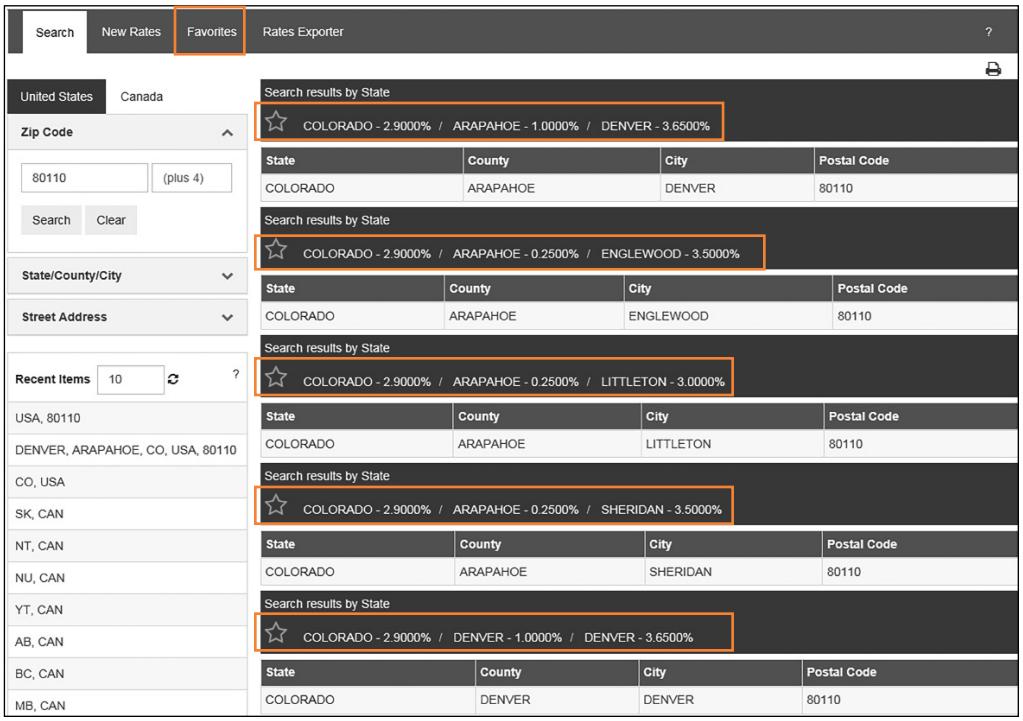

Bloomberg BNA
BNA Sales Tax Rates
Vote now
BBNA Editors
Help
Search
New Rates
Favorites
Rates Exporter
FAQ
United States
Canada
ZIP Code
ZIP
+4
Search
Clear
State/County/City
Street Address
Recent Items
10
PR, USA
Bloomberg BNA Sales & Use Tax Rate Finder
Introducing Bloomberg BNA's new Sales & Use Tax Rate Finder, designed for researching general sales and use tax rates. With this new tool, you have access to 9-digit ZIP code (ZIP+4) and street address-level sales and use tax rate information for taxing jurisdictions in the U.S., Puerto Rico, and Canada. Please note that certain special tax rates, such as those applicable to food, alcohol, and accommodations, as well as some district-specific taxes, such as those for airports, are not presently supported.
To find your 9-digit ZIP code (ZIP+4), start with the street address or visit the U.S. Postal Service (USPS) website. Each address is automatically cleaned, standardized, and verified using CASS software, which is certified by the USPS to ensure it is correct and deliverable. It is recommended to check with state revenue agencies to confirm tax rate information. For more important information about the method used to identify tax rate information, see the Frequently Asked Questions section of the Help (?) menu above.
To start your research:
1. Click one of the menus (ZIP Code, State/County/City, or Street Address) based on your search criteria.
2. Enter your search criteria into the form field(s).
3. Click the Search button, or press Enter to see the results for your search.
Have questions?
Contact us toll free at 1.800.372.1033.

Search using a zip code, and/or any combination of state, county, city, or street address.

When searching by zip code, try to use the zip + 4 as there can be different tax rates for the towns within that zip code. For example, see the difference in tax rates for zip code 80110.

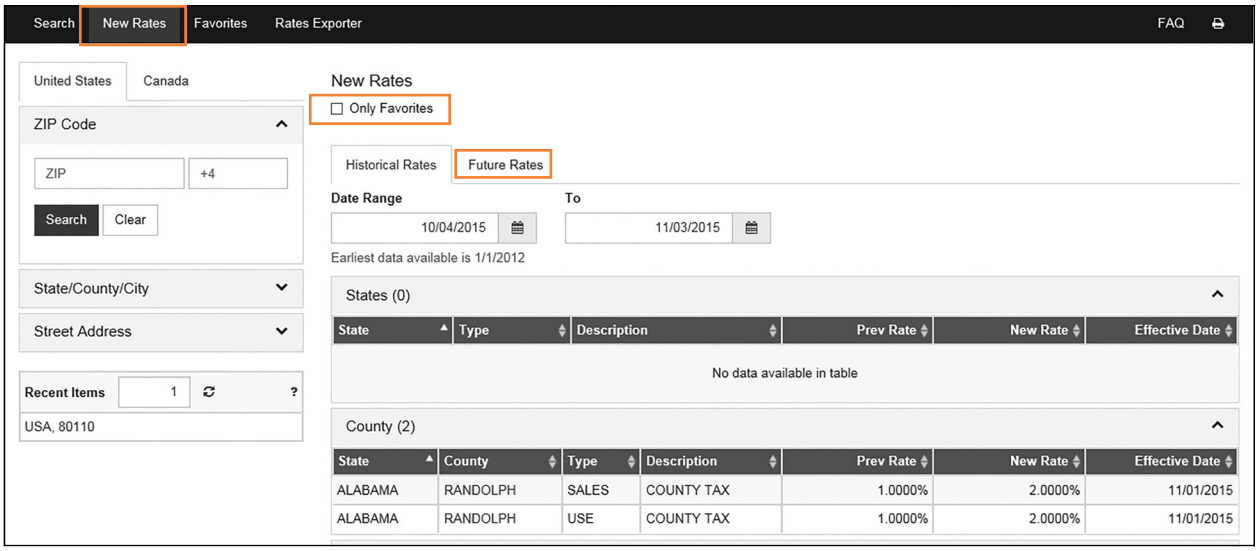
To create **Favorites**, click the **Star** icon ☆.

To view **Favorites**, click the **Favorites** tab.


Search
New Rates
Favorites
Rates Exporter
United States
Canada
Zip Code
80110
(plus 4)
Search
Clear
State/County/City
Street Address
Recent Items
10
USA, 80110
DENVER, ARAPAHOE, CO, USA, 80110
CO, USA
SK, CAN
NT, CAN
NU, CAN
YT, CAN
AB, CAN
BC, CAN
MB, CAN
Search results by State
COLORADO - 2.9000% / ARAPAHOE - 1.0000% / DENVER - 3.6500%
State | County | City | Postal Code
COLORADO | ARAPAHOE | DENVER | 80110
Search results by State
COLORADO - 2.9000% / ARAPAHOE - 0.2500% / ENGLEWOOD - 3.5000%
State | County | City | Postal Code
COLORADO | ARAPAHOE | ENGLEWOOD | 80110
Search results by State
COLORADO - 2.9000% / ARAPAHOE - 0.2500% / LITTLETON - 3.0000%
State | County | City | Postal Code
COLORADO | ARAPAHOE | LITTLETON | 80110
Search results by State
COLORADO - 2.9000% / ARAPAHOE - 0.2500% / SHERIDAN - 3.5000%
State | County | City | Postal Code
COLORADO | ARAPAHOE | SHERIDAN | 80110
Search results by State
COLORADO - 2.9000% / DENVER - 1.0000% / DENVER - 3.6500%
State | County | City | Postal Code
COLORADO | DENVER | DENVER | 80110

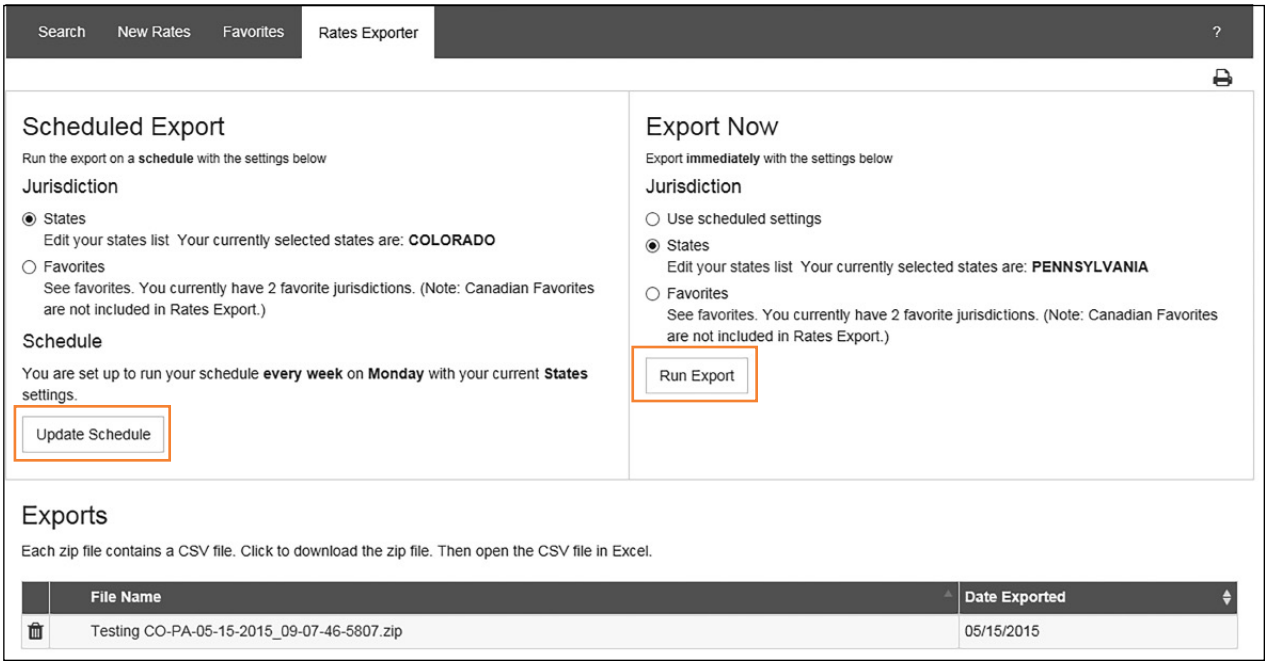
New Rates

View all tax rates published during the previous 30 days in the United States and Puerto Rico. To view the latest rates for your favorites only, check the **Only Favorites** checkbox. Click the **Future Rates** tab to view forthcoming rates.



Rates Exporter

Export tax rate data automatically at scheduled intervals, or manually at any time.


Search
New Rates
Favorites
Rates Exporter
?
Scheduled Export
Run the export on a schedule with the settings below
Jurisdiction
States
Edit your states list Your currently selected states are: COLORADO
Favorites
See favorites. You currently have 2 favorite jurisdictions. (Note: Canadian Favorites are not included in Rates Export.)
Schedule
You are set up to run your schedule every week on Monday with your current States settings.
Update Schedule
Export Now
Export immediately with the settings below
Jurisdiction
Use scheduled settings
States
Edit your states list Your currently selected states are: PENNSYLVANIA
Favorites
See favorites. You currently have 2 favorite jurisdictions. (Note: Canadian Favorites are not included in Rates Export.)
Run Export
Exports
Each zip file contains a CSV file. Click to download the zip file. Then open the CSV file in Excel.
File Name
Date Exported
Testing CO-PA-05-15-2015_09-07-46-5807.zip
05/15/2015

State Income Tax Sourcing Tool

Determine each state's rules for sourcing receipts and properly compute the sales factor when apportioning business income to the state using the *State Income Tax Sourcing Evaluator* and **Chart Builder**.

The Bloomberg BNA *State Income Tax Sourcing Evaluator* generates client-ready reports that compare receipts received by the company from certain activities to the state's position on whether the receipts received from those activities are sourced to the state, as determined by the state's responses in the annual Bloomberg BNA Survey of State Tax Departments and an analysis of state law.

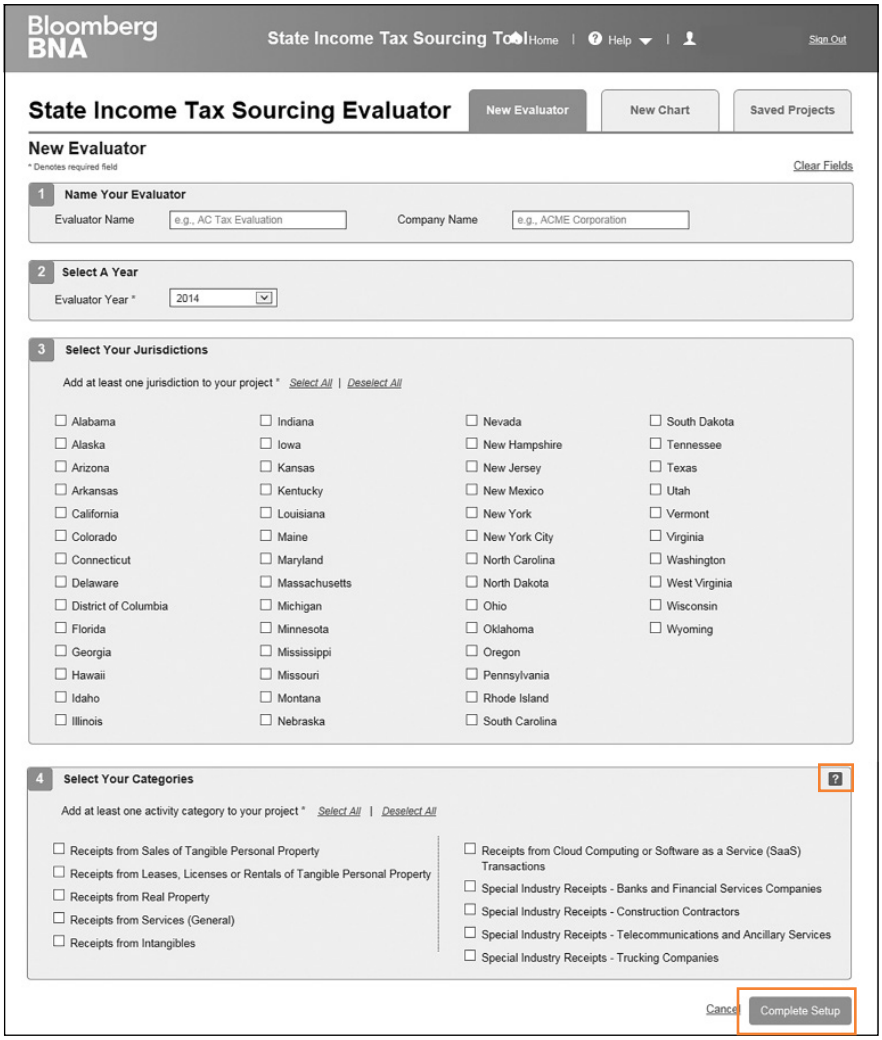
Use the **Chart Builder** feature to see which types of receipts must be sourced to each state for purposes of computing its sales factor. (See page 24 for general information about **Chart Builders**).

State Income Tax Sourcing Evaluator

Click the **New Evaluator** tab, name the **Evaluator**, and identify the **Company**. Follow the numbered steps and make selections for **Year**, **Jurisdictions**, and **Categories**.

For a description of each Category listed in 4 click the **Details** icon ?.

Click **Complete Setup**.



State Income Tax Sourcing Evaluator
(continued)

Each category-specific screen displays a customized list of questions to be answered.

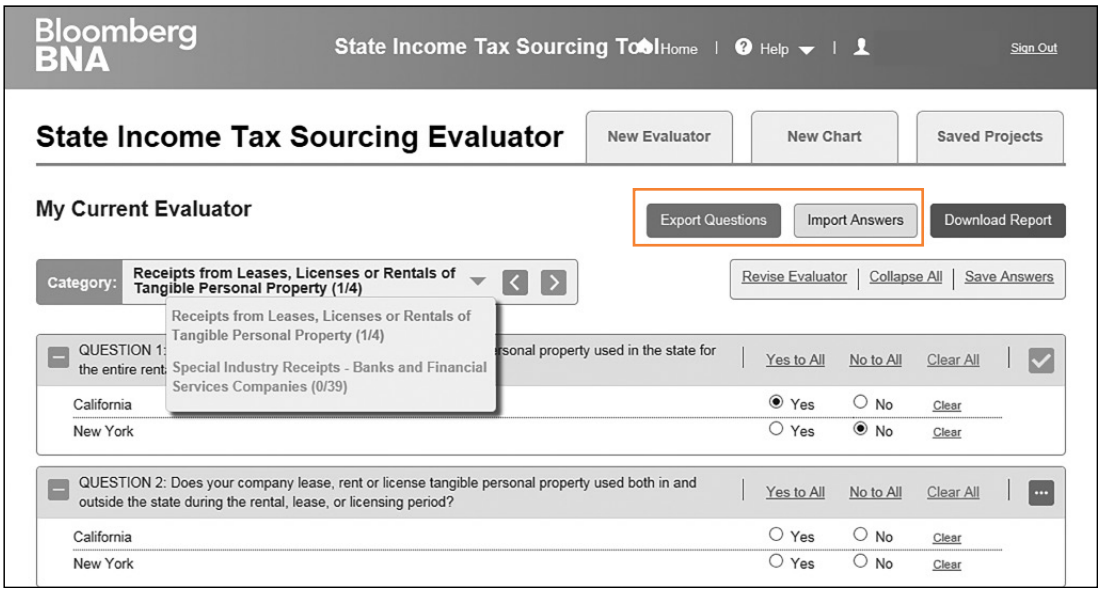
Click **Save Answers** to save the project whether the answers are all completed or not.

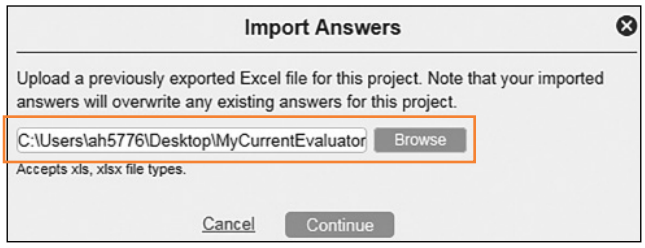
The **Category** frame at the top of the page displays a count of the number of answered questions vs. the total number of questions for each category. Use the drop-down menu to toggle among the selected categories.

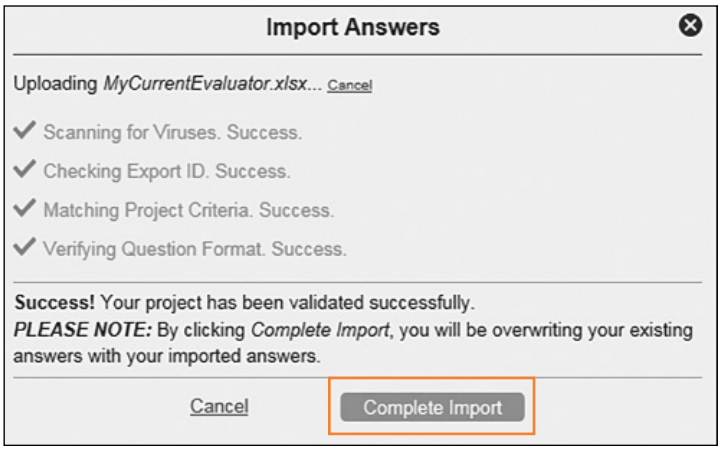
Export Questions/Import Answers

To answer the Project category questions in Excel, and then import them back into the Evaluator:

- Click **Export Questions**. Only files in the .xls (Excel 2003 and higher) or .xlsx (Excel 2007 and higher) versions will work. Only the answers can be changed in Excel. Note: changes to questionnaire answers from the imported Excel file will overwrite current answers in the project.
- In Excel, mark your answers with a single **x** character. Leave unanswered questions blank.
- The number of questions, jurisdictions, and categories must match the original export file in order to be imported. To add or remove states or topics, import your answers first, revise the project, and then export the file again. This will ensure the changes are not lost.
- Click the **Import Answers** button and **Browse** to select the Excel file to be imported.
- Click **Continue**. A status box displays following the progress of the upload.
- Click **Complete Import**.

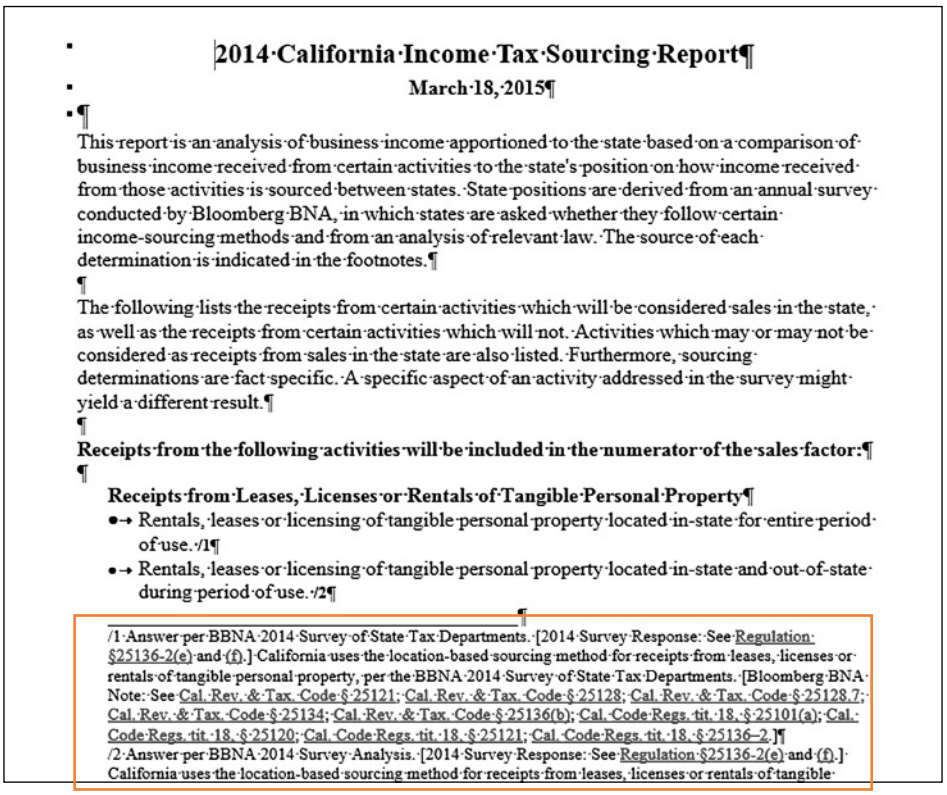



Import Answers
Upload a previously exported Excel file for this project. Note that your imported answers will overwrite any existing answers for this project.
C:\Users\ah5776\Desktop\MyCurrentEvaluator
Browse
Accepts xls, xlsx file types.
Cancel
Continue


Import Answers
Uploading MyCurrentEvaluator.xlsx... Cancel
Scanning for Viruses. Success.
Checking Export ID. Success.
Matching Project Criteria. Success.
Verifying Question Format. Success.
Success! Your project has been validated successfully.
PLEASE NOTE: By clicking Complete Import, you will be overwriting your existing answers with your imported answers.
Cancel
Complete Import

State Income Tax Sourcing Evaluator
(continued)

The linked **Report** downloads as a MS Word document and and can be printed or saved.



2014 California Income Tax Sourcing Report

March 18, 2015

This report is an analysis of business income apportioned to the state based on a comparison of business income received from certain activities to the state's position on how income received from those activities is sourced between states. State positions are derived from an annual survey conducted by Bloomberg BNA, in which states are asked whether they follow certain income-sourcing methods and from an analysis of relevant law. The source of each determination is indicated in the footnotes.

The following lists the receipts from certain activities which will be considered sales in the state, as well as the receipts from certain activities which will not. Activities which may or may not be considered as receipts from sales in the state are also listed. Furthermore, sourcing determinations are fact specific. A specific aspect of an activity addressed in the survey might yield a different result.

Receipts from the following activities will be included in the numerator of the sales factor:

Receipts from Leases, Licenses or Rentals of Tangible Personal Property

- Rentals, leases or licensing of tangible personal property located in state for entire period of use. /1
- Rentals, leases or licensing of tangible personal property located in state and out-of-state during period of use. /2

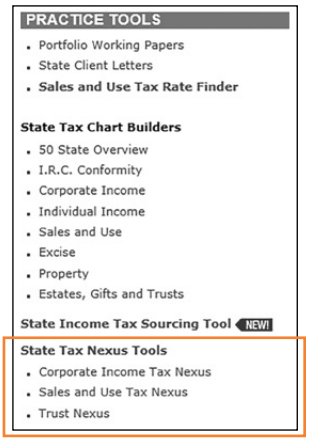
/1 Answer per BBNA 2014 Survey of State Tax Departments. [2014 Survey Response: See Regulation §25136-2(e) and (f).] California uses the location-based sourcing method for receipts from leases, licenses or rentals of tangible personal property, per the BBNA 2014 Survey of State Tax Departments. [Bloomberg BNA Note: See Cal. Rev. & Tax. Code § 25121; Cal. Rev. & Tax. Code § 25128; Cal. Rev. & Tax. Code § 25128.7; Cal. Rev. & Tax. Code § 25134; Cal. Rev. & Tax. Code § 25136(b); Cal. Code Regs. tit. 18, § 25101(a); Cal. Code Regs. tit. 18, § 25120; Cal. Code Regs. tit. 18, § 25121; Cal. Code Regs. tit. 18, § 25136–2.]

/2 Answer per BBNA 2014 Survey Analysis. [2014 Survey Response: See Regulation §25136-2(e) and (f).] California uses the location-based sourcing method for receipts from leases, licenses or rentals of tangible

State Tax Nexus Tools

Bloomberg BNA's **State Tax Nexus Tools** — **Chart Builder** and **Evaluator** — are available for **Corporate Income Tax**, **Sales & Use Tax**, and **Trust Nexus**. Featuring a one-of-a-kind online database and report generator, these tools streamline research on state tax nexus and give users input on a wide variety of specific scenarios, all validated by state tax departments and citations to primary sources. The **Chart Builder** tool creates state-by-state comparative charts showing each state's nexus policy. See page 24 for information on how to use a chart builder.

The **Evaluator** helps to determine if there is nexus in one or more states with a questionnaire about the types of activities being performed. Answers generate a detailed, client-ready report explaining each state's nexus law and showing the nexus consequences of each. See **State Income Sourcing Tool** (page 34) for information on how to use an Evaluator tool.



PRACTICE TOOLS

- Portfolio Working Papers
- State Client Letters
- **Sales and Use Tax Rate Finder**

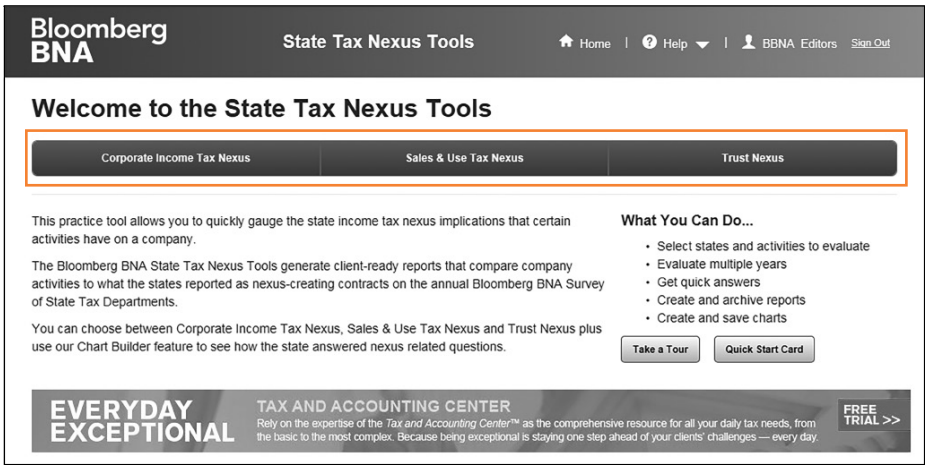
State Tax Chart Builders

- 50 State Overview
- I.R.C. Conformity
- Corporate Income
- Individual Income
- Sales and Use
- Excise
- Property
- Estates, Gifts and Trusts

State Income Tax Sourcing Tool NEW!

State Tax Nexus Tools

- Corporate Income Tax Nexus
- Sales and Use Tax Nexus
- Trust Nexus



Bloomberg BNA — State Tax Nexus Tools — Home | Help | BBNA Editors Sign Out

Welcome to the State Tax Nexus Tools

Corporate Income Tax Nexus | Sales & Use Tax Nexus | Trust Nexus

This practice tool allows you to quickly gauge the state income tax nexus implications that certain activities have on a company.

The Bloomberg BNA State Tax Nexus Tools generate client-ready reports that compare company activities to what the states reported as nexus-creating contracts on the annual Bloomberg BNA Survey of State Tax Departments.

You can choose between Corporate Income Tax Nexus, Sales & Use Tax Nexus and Trust Nexus plus use our Chart Builder feature to see how the state answered nexus related questions.

What You Can Do...

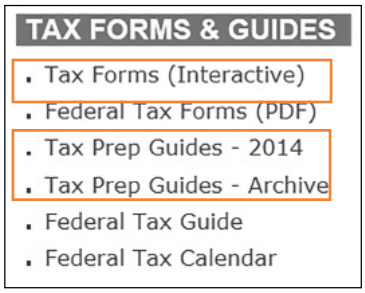
- Select states and activities to evaluate
- Evaluate multiple years
- Get quick answers
- Create and archive reports
- Create and save charts

Take a Tour | Quick Start Card

EVERYDAY EXCEPTIONAL
TAX AND ACCOUNTING CENTER
Rely on the expertise of the *Tax and Accounting Center*™ as the comprehensive resource for all your daily tax needs, from the basic to the most complex. Because being exceptional is staying one step ahead of your clients' challenges — every day.
FREE TRIAL >>

TAX FORMS

All Bloomberg BNA **Interactive Tax Forms** are government approved. Automated form processing requirements for barcodes, scanlines, validation fields, etc., are built in to guarantee filing requirements are met. New and updated forms are added to the collection as they are released by the issuing agencies. To access **Tax Forms** on the Web, click **Tax Forms (Interactive)** in the **Tax Forms** frame on the home page.

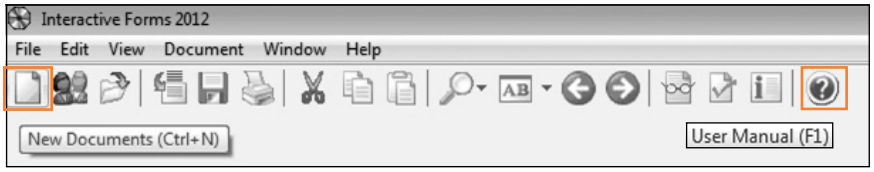

TAX FORMS & GUIDES
. Tax Forms (Interactive)
. Federal Tax Forms (PDF)
. Tax Prep Guides - 2014
. Tax Prep Guides - Archive
. Federal Tax Guide
. Federal Tax Calendar

Tax Prep Guides offer comprehensive how-to guidance for preparing forms 706, 709, 940, 941,1040, 1047, 1065,1120, and 1120S.

The *Federal Tax Guide* covers taxation of individuals, corporations, estates and trusts, and pass-through entities. It includes a special **Choice of Entity** section and provides businesses with options available to help determine which form of business entity is the most appropriate for a new or restructured enterprise.

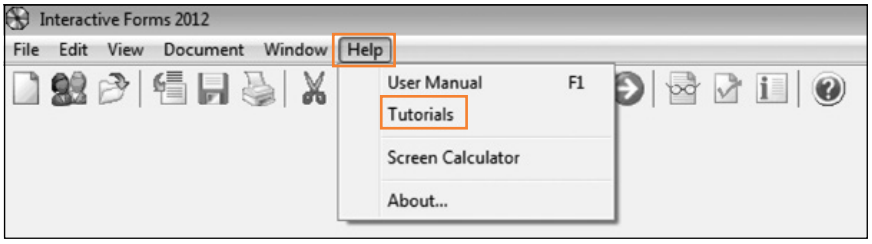
Toolbar

Click the toolbar buttons for the primary functions in the forms. Hover over a button to display the button's function.



Click the **User Manual** button for in-depth information about using **Interactive Forms**.

Click **Help** then select **Tutorials** for additional assistance with **Interactive Forms**.



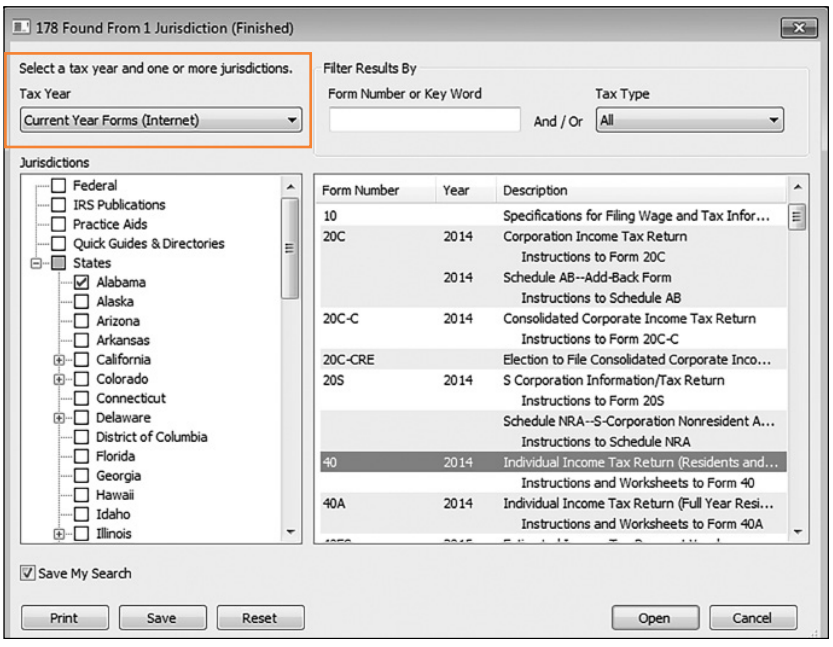
New Documents

Click the **New Documents** button. Select a **Tax Year** from 2001-current year forms are available.

Select a **Jurisdiction (Federal or States)**, **IRS Publications**, **Practice Aids**, or **Quick Guides & Directories**. The available form(s) display in the right column.

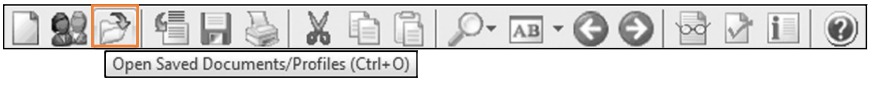
Select **Form Number(s)** or document(s) title as pertinent.

Click **Open**.



Saved Documents

To access previously saved **Documents** and **Profiles**, click the **Open Saved Documents/Profiles** button.

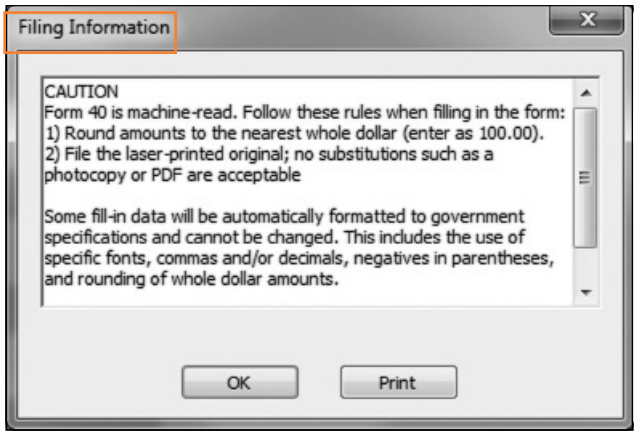


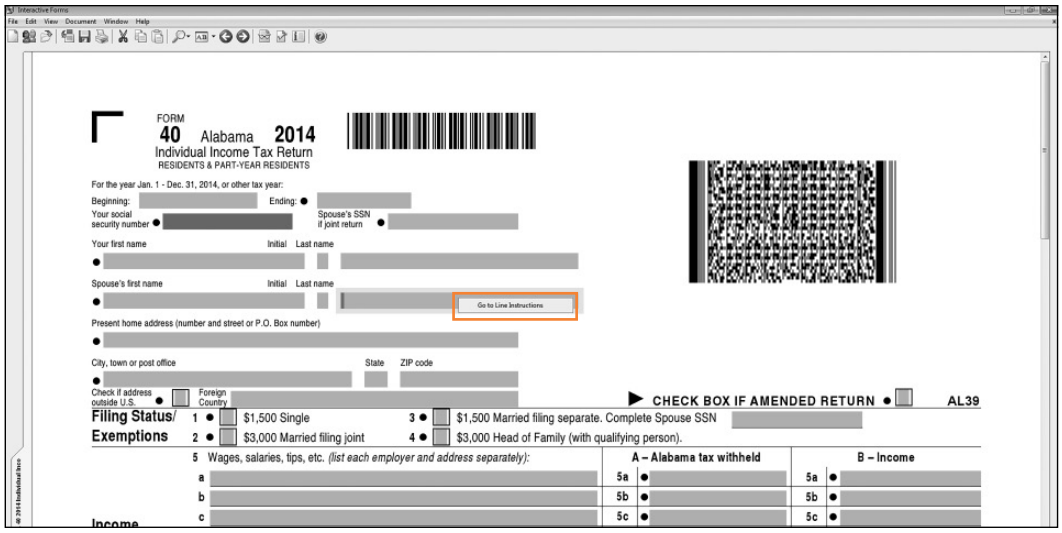
Forms Workspace

Filing information automatically displays when a form is opened.
Fields are color-coded:

- Red - Required field
- Aqua - Fill-in field
- Green - Auto-calculate field
- A Yellow outline indicates the active field.

Right-click in any line to display the **Line Instructions**.
To display the **Tax Tables** and **Rate Schedules**, right-click anywhere in the **Line Instructions**.
Note: not all forms have line instructions.


Filing Information
CAUTION
Form 40 is machine-read. Follow these rules when filling in the form:
1) Round amounts to the nearest whole dollar (enter as 100.00).
2) File the laser-printed original; no substitutions such as a photocopy or PDF are acceptable
Some fill-in data will be automatically formatted to government specifications and cannot be changed. This includes the use of specific fonts, commas and/or decimals, negatives in parentheses, and rounding of whole dollar amounts.
OK
Print



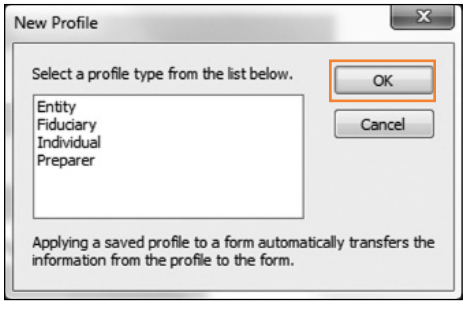
Profiles

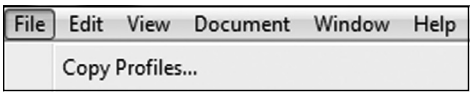
Profiles are reusable files containing contact and other pertinent information.

Click the **New Profiles** button to create a new profile. Select a profile for Entity, Fiduciary, Individual, or Preparer and click **OK**.

To apply profile information to a form, click the **Apply Profile Information** button, select the type of profile, and click **Open**.

To copy a previous year's profiles to the current year's client folders, click **File** and select **Copy Profiles**. The dialog box opens with the path to the previous years forms. Click **OK**.





Profiles are automatically copied to the current year's folder. If identical client names exist, information for each client is numbered (e.g., smith2, smith3) and placed in a data folder. A confirmation message displays when the process is complete.

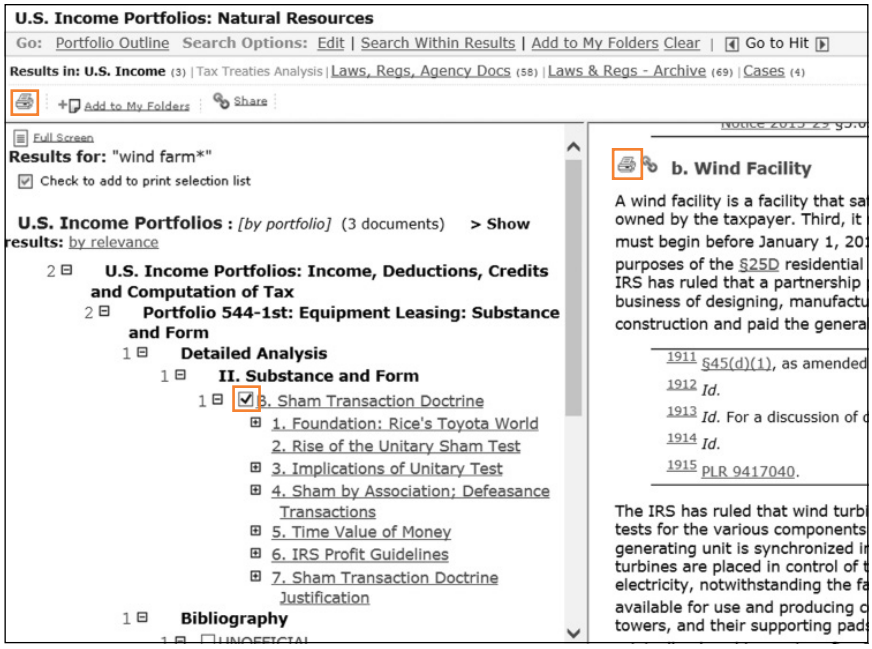
PRINT

To print a document(s), select the document(s) from a full-screen display, document list, or **Search Results** page. The selected documents are displayed in the **Print Dialog** box. To print a single document, click the **Print** icon while viewing the document.

To print multiple documents from the search results list, click the **checkbox** next to each document title to be printed, and then click the **Print** icon. A maximum of 25 documents can be printed simultaneously.

Segmented Printing

To print segments of Bloomberg BNA analysis, legislation, and regulations included in the *Tax and Accounting Center*, click the **Print** icon next to a segment.


U.S. Income Portfolios: Natural Resources
Go: Portfolio Outline Search Options: Edit | Search Within Results | Add to My Folders Clear | Go to Hit
Results in: U.S. Income (3) | Tax Treaties Analysis | Laws, Regs, Agency Docs (58) | Laws & Regs - Archive (69) | Cases (4)
Add to My Folders
Share
Full Screen
Results for: "wind farm*"
Check to add to print selection list
U.S. Income Portfolios : [by portfolio] (3 documents) > Show
results: by relevance
2 U.S. Income Portfolios: Income, Deductions, Credits and Computation of Tax
2 Portfolio 544-1st: Equipment Leasing: Substance and Form
1 Detailed Analysis
1 II. Substance and Form
1 3. Sham Transaction Doctrine
1. Foundation: Rice's Toyota World
2. Rise of the Unitary Sham Test
3. Implications of Unitary Test
4. Sham by Association; Defeasance Transactions
5. Time Value of Money
6. IRS Profit Guidelines
7. Sham Transaction Doctrine Justification
1 Bibliography
b. Wind Facility
A wind facility is a facility that sa
owned by the taxpayer. Third, it
must begin before January 1, 20
purposes of the §25D residential
IRS has ruled that a partnership
business of designing, manufactu
construction and paid the genera
1911 §45(d)(1), as amended
1912 Id.
1913 Id. For a discussion of
1914 Id.
1915 PLR 9417040.
The IRS has ruled that wind turbi
tests for the various components
generating unit is synchronized i
turbines are placed in control of t
electricity, notwithstanding the fa
available for use and producing c
towers, and their supporting pad

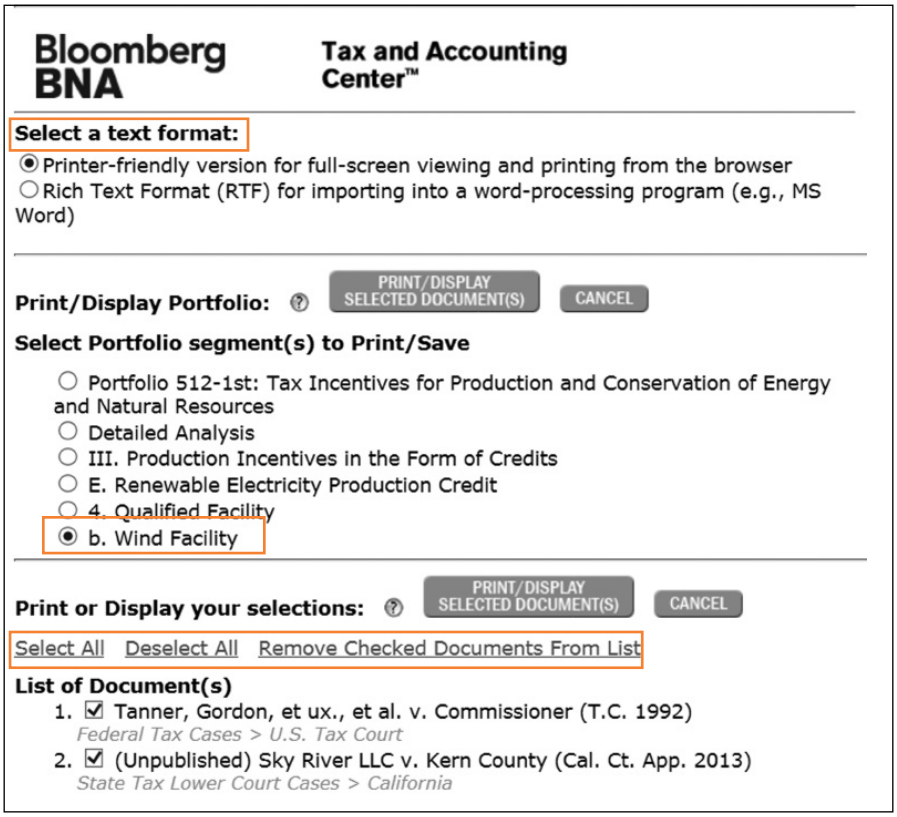
Print Dialog Box

Select a text format
Print documents in either **Printer-friendly** or **Rich Text Format (RTF)** text format. When printing more than one document, select **RTF** in order to place section breaks between each document.

Select segment(s)
Click the radio button to choose the Portfolio segments to print. The segments displayed below the selected segment are also printed.

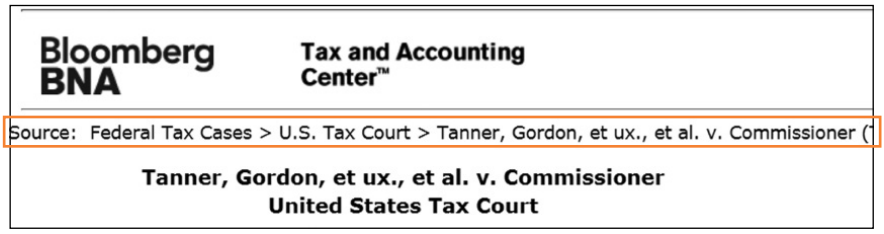
Print or Display your selections
To select and deselect documents prior to printing, use the linked commands in the print dialog box.

Click the **Print/Display Selected Documents** button for each frame to launch the print preview function. Use the browser's print function to print.


Bloomberg BNA
Tax and Accounting Center™
Select a text format:
Printer-friendly version for full-screen viewing and printing from the browser
Rich Text Format (RTF) for importing into a word-processing program (e.g., MS Word)
Print/Display Portfolio:
PRINT/DISPLAY SELECTED DOCUMENT(S)
CANCEL
Select Portfolio segment(s) to Print/Save
Portfolio 512-1st: Tax Incentives for Production and Conservation of Energy and Natural Resources
Detailed Analysis
III. Production Incentives in the Form of Credits
E. Renewable Electricity Production Credit
4. Qualified Facility
b. Wind Facility
Print or Display your selections:
PRINT/DISPLAY SELECTED DOCUMENT(S)
CANCEL
Select All Deselect All Remove Checked Documents From List
List of Document(s)
1. Tanner, Gordon, et ux., et al. v. Commissioner (T.C. 1992)
Federal Tax Cases > U.S. Tax Court
2. (Unpublished) Sky River LLC v. Kern County (Cal. Ct. App. 2013)
State Tax Lower Court Cases > California

Source Information

The print display opens in a separate window and adds source and contact information to the top and bottom of the document(s).


Bloomberg BNA
Tax and Accounting Center™
Source: Federal Tax Cases > U.S. Tax Court > Tanner, Gordon, et ux., et al. v. Commissioner (
Tanner, Gordon, et ux., et al. v. Commissioner
United States Tax Court

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